

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**PRUDENCE BUSHNELL,
RICHARD BUCKLEY,
SUSAN BUSHNELL,
PETER BUSHNELL,
JONATHAN BUSHNELL,
LEE ANN ROSS,
HERBERT BLANK,
MARGARET ROSS,
MARGARET ROSS, EXECUTRIX OF
THE ESTATE OF KENNETH ROSS,
KELSEY BLANK,
TIMOTHY BLANK,
STEVEN ROSS,
SALLY MCCAFERTY,
MIKE TROTT,
WENDY TROTT,
MELANIE SIGUERE,
ASHLEE DITTMER,
JASON TROTT,
CHERYL WILLIAMS,
DONNA WILLIAMS-ALEXANDER,
LINDA K. WILLIAMS,
SHANNON LOVGREN,
STEFAN LOVGREN,
CHRISTOPHER TITUS,**

CASE NO.

COMPLAINT

TROY BARAJAS,
GEORGE JONES,
CAROLE JONES,
TAMARA JONES,
GREGORY JONES,
THOMAS PAPERNO WOLF,
MICHELE MCNABB,
KAY PERRY,
JACQUE PHILLIPS,
NEAL KRINGEL,
DELAINE MACDONALD,
FRANKLIN KRINGEL,
NANCY KRINGEL,
KIANA KRINGEL,
LINDA KNUTH,
LINDA HOWARD,
KAY SHIREY,
RUTH BUCKLEY,
JOHN DUNLOP,
ANGELIQUE M. DUNLOP,
JUDITH DUNLOP,
JUDITH DUNLOP, ON BEHALF OF
JAMES J. DUNLOP, DECEASED,
JAMES K. DUNLOP,
JUNE MARIE O'CONNELL,
HORACE W. HUNTER,
PATRICIA HUNTER,

MARK HUNTER,
ROBIN HUNTER,
PAIGE HUNTER,
MARCH HUNTER,
LINDA CLARK,
MARY K. CLARK,
LYNN CRIPE,
CHRISTOPHER LEE STILLMAN,
ADAM BERGER,
JESSICA STILLMAN,
SHABYNA KOLKER STILLMAN,
JEFFREY N. KOLKER,
ADAM D. KOLKER,
MOHAMED BASHIR AWAN,
RUKIA CHEROND AWAN,
MOHAMED KHALIL AWAN,
STEVE NOLAN,
JUDY NOLAN,
LINDA HOWEY,
GREG GOTTLIEB,
JOSEPH GOTTLIEB,
TALIA GOTTLIEB,
RON ROUGHEAD,
DIANNE ROUGHEAD,
MELINDA WILSON,
JOHN WILSON,

ZACHARY LEE WILSON,
SAMUEL PETER WILSON,
EMILY CLAIRE WILSON NAULA,
DAVID STOTT,
MARIANA NOLAN,
ANNETTE FALYDEN,
SUSAN WILEY,
JOSEPH WILEY,
CALVIN M. KONNER,
JAN KONNER,
SCOTT KONNER,
JULIA KONNER,
CINDY MURPHREE,
TERRY MURPHREE,
MONICA STEIN OLSON,
JAMES R. DEMPSEY,
HOLLY FLUTY DEMPSEY,
MICHELLE FOLSOM,
DR. BERNARD NAHLEN,
RUBY L. NAHLEN,
JANE TARBOE,
BRUCE NELSON,
MARK A. NELSON,
JILL NELSON,
WILLIAM E. JOHNSON, JR.,
MARILYN S. DYSON,

SHELIA A. PHIPPS,
CHRISTOPHER K. JOHNSON,
WILLIAM RICHARD GARLAND, JR.,
GAIL L. GARLAND,
PATRICIA LYNN GARLAND,
JOHN C. GARLAND,
ANGELA M. JOHNSTON,
AMANDA LEVENSON,
BURTON E. LEVENSON,
ISAAC S. LEVENSON,
ELIAS A. LEVENSON,
DONALD MACKENZIE,
CYNTHIA GRANT MACKENZIE,
DEVON KATHERINE MACKENZIE,
DAVID ROBERTSON,
LORI D. GARDNER,
MATTHEW DAVID ROBERTSON,
DANIEL GERARD ROBERTSON,
WILLIAM HOWARD SEARCY,
CHARLES SLATER,
ELIZABETH MARY SLATER,
FORBES ALLAN SLATER,
CLARENCE STEVEN MCGANN,
STEVEN GAIL WISECARVER,
BARBARA FRANCES BROWN,
DIANA PUTMAN,

ADAM MESSER,
CATHERINE NYAMBURA,
ANNE WAIRIMU CHEGE,
MALCOLM CHEGE,
BENNY MESHULLAM,
ANTHONY THIONG'O CHEGE,
MARIE ELLEN NJAMBI,
BEATRICE NALIAKA WEKESA,
BELDINA ADHIAMBO ODIANGO,
COLLINS ODUOR ODIANGO,
CHRISTOPHER JUMA ODIANGO,
EUNICE ANYANGO ODIANGO,
RACHEL AUMA ODIANGO,
RICHARD LUSI ODIANGO,
MILKA AKINYI ODIANGO,
CHRISTABEL ANYANGO ODIANGO,
JOSEPH KAZUNGU KATANA,
LUCY NYABONYIA KAZUNGU,
JOSEPH KAZUNGU KATANA,
ADMINISTRATOR OF THE ESTATE
OF KATANA KARISA,
KADII KATANA KARISA,
LIZ KAZO KAZUNGU,
CONNIE SIDI KAZUNGU,
FRANCIS KATANA KAZUNGU,
MACHIL YUBU KAZUNGU,
ALFONS KATANA,

CRISPAS KATANA,
KAZO KATANA,
SIDI KATANA,
MARIAM KATANA,
JUMWA KATANA,
HADIJA KATANA,
ZAWADI KATANA,
ELIPHAS KATHUNI MUGO,
RHODA KATHUNI,
ADDISON NJIRU MUGO,
CYNTHIA NCIDKI MUGO,
ANDREW NYAGA MUGO,
AGNES WAMBUI MUGANE,
DAVID IKABAH KANYANJUA,
MARGARET KANUNA,
THOMAS NGANGA KINUTHIA,
PAULINE WANJIRU KANYANJUA,
VENAZIO MACHARIA,
JANET NYAMBURA,
ZACKARIA MUTHIORA,
NANCY WANJIRU,
JOHN MWANGI/KANINU,
ANTHONY NJONGE NGINYA,
MARY WABGUI NJUNGE,
ESTHER WAITHIRA KUNGU,
DAVID MURIITHI NJUNGE,

ESTHER WAITHIRA NJUNGE,
JAMES NJOROGI NJUNGE,
PETERSON MWANGI NJUNGE,
MARGARET NYAMBURA,
JOHN NJOGY NJUNGE,
ROSE WANJIKU,
JOYCE NDUTA,
FRANCIS WALTER OFUNJA,
JACKLINE TABU AGUNDA,
BONIFACE KARIMI GITHUI,
ANASTASIA WANJIRU KARIMI,
ANTHONY KAIRU KARIMI,
ROSE NYAWIRA KARIMI,
CATHERINE NJERI KARIMI
IGATHE,
PAULI GITHUI KARIMI,
PETER MAINA KARIMI,
LADISLAUS MAINA GITHUI,
TARSIRA WANJIRU GICHIMU,
SYMPHOROSA WANGARI KARIUKI,
FRANCIS KIBOI GITHUI,
DONATUS MATHENGE,
BOSCO KIMANI NJOROGI,
JANE WANGARU KIMANI,
NJOROGI KIMANI,
WANJA NJOROGI,
MARVIN NJOROGI KIMANI,

CYNTHIA WANJA KIMANI,
ROSEMARY KANINI OCHIENG,
PETER CHOGO NJOROGÉ,
JOHN GICHINGA NJOROGÉ,
ANN GATHONI NJOROGÉ,
JANE NJERI NJOROGÉ,
ISMAHEL NJOROGÉ,
CECILIA AGNES WAKIO AMAHAYA,
BERNARD AMAHAYA MULAMA,
MICHELLE GAZEMBA AMAHAYA,
CALVIN MULAMA AMAHAYA,
TIMOTHY KOMBO AMAHAYA,
ELIZABETH MUGHOI KOMBO,
CYRUS MAINA KARITU,
VALENTINE NYAWIRA MAINA,
DICKSON MUREITHI MAINA,
PHILLIS WAMUYU MAINA,
ANNE WANJIKU MAINA,
DICKSON GAD NJOROGÉ,
DICKSON GAD NJOROGÉ,
ADMINISTRATOR OF THE ESTATE
OF JAMES NJOROGÉ GITHU,
RAHAB MWIHAKI NJOROGÉ,
LEAH WANGUI GITHU,
JAMES NJOROGÉ GITHU,
PAUL MBUGUA,
BONIFACE MURIU,

ROBERT GITHUI GITHU,
DOROTHY ADOYO OKACH,
DONALD ODHIAMBO ONUNGA,
CATHERINE ATIENO AGALLO,
OSCAR OYOO ONUNGA,
MILDRED ANYANGO AGALLO,
ENOS ADUNDO OKACH,
EDWIN WARUINGE NJAU,
RACHEL WARUINGE,
JOHN NJAU WARUINGE,
AGNES NJAU,
WILFRED WARUINGI,
MARCUS WARUINGI,
RAMSES WARUINGI,
MATHEW NJAU,
FRANCIS NJAU,
BEATRICE NJAU,
ELIZABETH IMMACULATE AWINO,
MBOSS,
JOSEPH JOHN MBOSS,
ELIZABETH AWINO MBOSS,
ADMINISTRATOR OF THE ESTATE
OF MICHAEL PIUS ONDURU,
ELIZABETH AWINO MBOSS,
ADMINISTRATOR OF THE ESTATE
OF MARGARITA AKEYO ONDURU,
ELIZABETH AWINO MBOSS,
ADMINISTRATOR OF THE ESTATE
OF AUDREY LOURDES MBOSS,

YVONNE MAGDALINE MBOSS,
LILIAN MBOSS,
PETER OTIENO MBOSS,
LAVANDER BIANCA MBOSS,
DAVID OTIENO MBOSS,
STEPHEN OWINO MBOSS,
JULIA ANYANGO ONDURU,
PRISCA ACHIENG ONDURU AKOTO,
CHARLES OJWANDO ONDURU,
ISABELLA AKUMU ONDURU,
ROSEMARY ADHIAMBO ONDURU,
BERNADETTE AKINYI ONDURO,
FLORENCE ADHIAMBO ONDURO,
ESTHER MUTHONI KIMANI,
ELIZABETH WANGARE KHALID,
NADYA KHALID ISSA,
ABDALLA KHALID ISSA,
FRANCIS MALUKU KAVULU,
FRANCIS MALUKU KAVULU,
ADMINISTRATOR OF THE ESTATE
OF TABITHA MUMBUE,
JOHN KYULE KAVULU,
PHOEBE NDUKU KAVULU,
FRANCIS MALUKU KAVULU,
ADMINISTRATOR OF THE ESTATE
OF PHILLIP MUTUA KAVULU,
FRANCIS MALUKU KAVULU,
ADMINISTRATOR OF THE ESTATE
OF JOHNSON KIMONGI KAVULU,

FRANCIS NYADIMO YWAYA,
PERIS OLOO,
FREDRICK FRANCIS MUNYALO,
RUTH KALUKI KIMILU,
JOYCE NDANU MUNYALO,
AGNESS SYOMITI FRANCIS,
MUNYALO FRANCIS,
MALUSI FRANCIS,
NELLY MWIKALI FRANCIS,
CHRIUSTINE NDANU FRANCIS,
NDINDA FRANCIS,
MUTETHYA FRANCIS,
TERESIA MALAVUTI,
FLORENCE MUTISO,
MUKELI MUNYALO,
NZOMO MUNYALO,
GEORGE KIMANI KABARE,
CATHERINE LOANDOI KIMANI,
CAROL MURUNGI KIMANI,
STELLA MUTHONI KIMANI,
GEORGE ODHUR OMBIS,
GODFREY GICHUKI KINYUTU,
GODFREY GICHERU WAWERU,
JANE WAMBUI GICHERU,
GODFREY GICHERU WAWERU,
ADMINISTRATOR OF THE ESTATE
OF HANNA WAMBUI WJAU,

KEZIAH NJOKI GICHERU,
MARK WAWER GUCHERU,
TERESA NGINYI,
JANE GACHERI NGARA,
CHARLES NGARA KIRIMANIA,
MAUREEN KAJUJU NGARA,
DERRICK MWITI NGARA,
MICHELLE MWENDWA NGARA,
JEFF MUTUMA NGARA,
ERIC MUTHONI MWIREBUA,
MIRIAM MUGURE MWIREBWA,
JEAN WAITHIRA KINYANJUI,
JENNIFER NDUNGE MULLI,
JENNIFER NDUNGE MULLI,
ADMINISTRATOR OF THE ESTATE
OF PRICILLA KALEKYE GEORGE,
SHEILA MUMBI MULLI,
YVONNE KALECHE MULLI,
ANTHONY MULLI,
FREDRICK MULLI,
PETER NZOMO MBALUKA,
CECILIA MTHENYA NZOMO,
RUTH NDUKU NZOMO,
JOHANA NDUGIRE KAMANU,
CATHERINE WANGUI NDUGIRE,
JOYCE ANYANGO NDUGIRE,
JULIA WAIRIMU NDUGIRE,

MARY WANJA NDUGIRE,
LAVANDER AKINYI NDUGIRE,
JOHN KARANJA NJIRAINI,
GLANDWELL WANGARI KARANJA,
ANNE WANJIKU KARANJA,
LYDIAH WANJIKU KARANJA,
CYNTHIA WAIRIMU KARANJA,
GEORGE NJIRAINI KARANJA,
JOHN KARERU MIANO,
EUNICE RUNJI MIANO,
KELVIN SAMMY MUCHIRI,
HILDA MUKAMI JOHN,
SIMON MUCHIRA MIANO,
JOHN NJORGE KINUTHIA,
ANN WANJIRU KIRUMBA,
JOHN NJORGE KINUTHIA,
ADMINISTRATOR OF THE ESTATE
OF CLEMENT KINUTHIA NJORGE,
LOYCE WAIRIMU NJORGE,
MICHAEL KIARIE KINUTHIA,
JOSEPH KAMAU KINUTHIA,
LAWRENCE BENU NDUNGU,
MARY GATHONI BENU,
JANE WANGARI WANJIKU,
JOHN NDUGU BENU,
JOSEPH MWENDA BENU,
IRINE WANGARI,

BEATRICE NDUTA BENU,
ELIZABETH MUTHONI,
EVERLINE WANJIKU BENU,
EDWIN NDUNGU BENU,
EDWARD MURITHU NDUNGU,
LUCY WAITHIRA,
CLEMENT MUGO NDUNGU,
MARTHA MWIHAKI,
TERESIA WAIRIMU,
JACINTA NJERI NDUNGU,
AGNES WAIRIMU WANDUI,
JOHN MACHARIA NGUGI,
NANCY WANJIRU NJOROGE,
BENSON NGUGI WILLIAM,
MONICA WANJIKU NGUGI,
MONICA WANJIKU MACHARIA,
BENSON NGUGI MACHARIA,
ALICE WANJIRU NJOROGE,
WILLIAMSON KAMITI NGUGI,
SUSAN WANGARI NGUGI,
GRACE NJOKI NGUGI,
MARION GATHONI NGUGI,
JAMES NJENGA NGUGI,
ROBERT GATHINJI NGUGI,
ZACHARIA NGANGA NGUGI,
ESTHER WAITHERA NGUGI,

STEPHEN NJUNGUNA NGUGI,
JOHN YATOLI OCHERO,
ANJELINE KADUKA YATOLI,
FRIDAH KHAYATI NJUNGA,
PAULINE ASHIYA YATOLI,
CATHERINE VAGOLA YATOLI,
CAROLINE OLUKAKHA,
GEORGE AKHWALE YATOLI,
MIKE AMUKOMBERA YATOLI,
EUNICE APOONDI,
WYCLIFFE NYONGA YATOLI,
ASHILINE ASHIKA YATOLI,
JOSEPH NYAMWEYA ONDIGI,
MERCY ONDIGI,
MELVIN ONDIGI,
LUCY MOCHECHE MOGENI,
ELIJAH NYABUTI MOGENI,
VALERY MICHOKY MOGENI,
HUMPHREY OMBATI MOGENI,
LUCY NJERI MUGWERU,
LUCY NJERI MUGWERU,
ADMINISTRATOR OF THE ESTATE
OF JAMES NYINGI,
SILVIA W. NYANJUI,
TABBI W. NYANJUI,
PATRICIA MUGWERU,
SUSAN MUGWERU,

WILSON MUGWERU,
ALICE MUGWERU,
SALOME MUGWERU,
MARY WAIRIMU MUIRURI,
MARY MUIRURI, ADMINISTRATOR
OF THE ESTATE OF JAMES NGUNYI
WAMBUGU,
MUIRURI MWANGI,
WAMUYU MWANGI,
SAMUEL WAMBUGU NGUGYI,
JOYCE MUTHONI CHEGE,
JOHN NGUNJIRKI NGUNYI,
PETER KIMITI NGUNYI,
MICHAEL MUSYOKA NDETI,
AGNES NTHENYA MUSYOKA,
ESTHER WANJIKU MUSYOKA,
MARY VISA MUSYOKA,
SYLVIA NGINA MUSYOKA,
REGINA MUTIO MUSYOKA,
NASHON WASUA MWONDOKO,
ESTHER MWEKU MUVEA,
JULIET KANINI WASUA,
SERA MWINZA WASUA,
PJILIP MUMO WASUA,
RHODA MUTHEU WASUA,
SAMUEL MUTINDA MWANDOKO,
JOEL WAMBUA MWANDOKO,

EUNICE MUENI MWANDOKO,
ROSE MUKERI MWANDOKO,
PATRICIA MSALA OGWANG,
MILYCENT ACHIENG,
PIUS BARASA WARABA,
JOY AMBICHE BARASA,
JUDITH KHALAYI BARASA,
BRENDA NANGONI BARASA,
SIMON MAGAMBA LIVOLE,
LINNET ADISA,
PAUL MAGAMBA LIVOLE,
SABET KAVETHA,
HERMAN ATSIAYA,
JOEL MAGAMBA,
WINNIE KAZUNGU,
STEPHEN KAIRU GATUNDU,
MARGARET WANJIKU KAMUNYU,
MAUREEN WANJIRU KAIRU,
ANN WANJA KAIRU,
JAMES JOMO GATUNDU,
MOSES NYURURU GATUNDU,
JOSEPH OLANG'O ADERO,
ANNAH OLANG'O ADERO,
SARAH ACHIENG OLANGO,
STEPHEN OTIENO OLANG'O,
CHRISTINE AKOTH OLANG'O,

ELIZABETH AKINYI OLANGO,
ROSELIDA AWUOR OLANG'O,
MARGARET ANYANGO OLANGO,
DINAH KAMBURA KIHARA,
GEORGE KIHARA MBURU,
BONIFACE NDEGE KIRIGIA,
ADMINISTRATOR OF THE ESTATE
OF PASKWALE KIRIGIA,
SILVANA MBUTHU KIRIGIA,
GLADYS GACIGI KIHARA,
BONIFACE NDEGE KIRIGIA,
BONIFACE NDEGE KIRIGIA,
ADMINISTRATOR OF THE ESTATE
OF ERNEST KINYUA KIRIGIA,
MARY KIARIE,
NOAH KIARIE,
REBECCA NYARUAI MUHORO,
MUITA THIRIKWA,
KEVIN WAMBU KIARIE,
SHEILLA NYOKABI KIARIE,
RICHARD GITONGA KIARIE,
HELLEN NYANJAU,
ROSE WANGUI MUITA,
PAUL MUHORO MUITA,
JANE NYOKABI MUITA,
GEORGE THIRIKWA,
JOYCE WANJIRU MUNENE,
ARTHUR NGANGA GITUKU,

LOISE WANJIKU MWAURA,
JOSEPH GITUKU NGANGA,
ARTHUR GITUKU, ADMINISTRATOR
OF THE ESTATE OF NANCY
WAIRIMU GITUKU,
NANCY MERCY WAIRIMU
NGAGNGA,
VIRIDIANA WALEGHWA MATANO,
RAYMOND MATANO,
ELIZABETH MKALA,
NICHOLAS MATANO,
SYLVESTER MATANO,
RAPHAEL MKALA,
VENERANDA MKALA,
BLANDINA MKALA,
PATRICK MKALA,
KAROLI MKALA,
MARIANNE MWANZIA,
LEVINA MKALA,
IVETA MKALA,
JOHN MKALA,
LUCY MKALA,
GALDINO MKALA,
FLORIAN MKALA,
JAMES OWONDO RATTA,
ROSEMARY ADHIAMBO,
BERNIE ODHIAMBO RATTA,
SUSAN ATHIENO RATTA,

**GILLIAN AKINYI RATTA,
CONSOLATA JUMA HASERO,
HENRY OKOTH RATTA,
COLLETA AKINY OMBUKU,
MARY AWUOR,
PETER OTIENO,
MARGARET ADHIAMBO,
MILLY WAIRIMU NGARI WAROBI,
JAMES MBUGA NGARI,
RACHEL WAITHERA NGARI,
MARK KAMAU NGARI,
PAMELA APIYO OLENDE,
CORNELIUS OLENDE,
GERALD OULA OLENDE,
FREDRICK ONYANGO OLENDE,
YVETTE RACHIER OLENDE,
DOROTHY MONGI,
ROSE ADUDA,
PETER MUNYORO KANYORO,
SUSAN THERU GITARI,
THOMAS THEURI MUNYORO,
CAROLINE NJERI MUNYORO,
FREDRICK GITARI MUNYORO,
JOSEPH MATHENGE KANYORO,
BEN MUNENE KANYORO,
LYDIA WANGECHI KANYORO,**

SIMON GIKONYO KANYORO,
AGNES WACHERA KARUGA,
SAMMEI KARIUKI KANYORO,
CATHERINE KAARI KANAMPIU,
LUCY NJERI JOHANA,
AMOS NDUNGU RIGICHA,
GRACE NYAMBURA NDUNGU,
RACHAEL WAITHIRA NDUNGU,
DAVID RIGICHA NDUNGU,
JOHN KIMANI NDUNGU,
GRACE WANJIRU NDUNGU,
GEOFFREY KANJA GITUNGO,
NANCY WANJIRU,
MOSES N'GUGI,
CATHERINE WAMUYU MUNGAI,
GRACE WANGUU MUNGAI,
MAIGA WAMBUI MUNGAI,
CHARLENE JEPKORIR TOO,
RUTH CHEROPON KIMUTAI,
JOHN KIPKOECH TOO,
GRACE KAKENIA TANYASSIS,
MIKE HAMILTON M TANYASSIS,
MARGARET MEOLY,
NOELLE SINTEI TANYASSIS,
BRIAN SELELO TANYASSIS,
DAVIES NKAITOLE TANYASSIS,

JEFFREY LEMAYIAN TANYASSIS,
STEPHEN LUKEINE MEOLY,
THOMAS MERITEI MEOLY,
STEPHEN KAGWATHI KIBACHIO,
KIBACHO KIRORONGU GITHII,
VERONICAH WANJERI KIBACHIO,
JOHN GAKURU KIBACHIO,
NELLY WANJIRU KIBACHIO,
MERCY WAMBUI KIBACHIO,
ALICE NJOKI KIBACHIO,
NANCY TITEU METEYO,
RUTH SITONIK,
IAN KIMANI MWANGI,
NANCY METEYO, ADMINISTRATOR
OF THE ESTATE OF SUSAN S
SITONIK,
SIMON T METEYO,
EVA MONARI,
SAMWEL SITONIK,
GRACE WAMBUI KABARE,
KEVIN RUKU KABARE,
COLLINS KAMAU KABARE,
LYDIA WANJIKU KARANJA,
AGNES WANJIRU GIKONYO,
ESPHAN MBATIA KABARE,
JAMLICK NJOROGI KABARE,
LEAH WAIRIMU MUINDE,

LOISE HUGIRU MUKIRA,
MOSES MUKIRA,
JACQUELINE NJERI MUKIRA,
MARGARET NYAMBURA MUKIRA,
EVELYNE AYOTI AMULYOTO,
SHEILLAH MUYUKA KHAGAI,
ROSABELLA KASUNGU SHIHEMI,
WINNIE MBARIA MAINA,
JOHN SHIHEMI,
WILLIAM SHIHEMI,
LIVINGSTONE SHIHEMI,
VIOLET MOGAH,
JOHN SHIHEMI, ADMINISTRATOR
OF THE ESTATE OF DARLENE
AOKO SHIHEMI,
PETER KAHORA MAKENA,
CAROLINE KABURA,
MAGDALINE WANGECHI,
JANET NJERI,
RAPHAEL KAMANDE KANYOTU,
DOROTHY WANJIRU KAMANDE,
JOSEPH KANYUTU KAMANDE,
DIANA MUTHONI KAMANDE,
DAVID KIMATHI,
JEMIMAH SYOKAU MUMO,
SIMEON MOMANYI,
JEMIMAH MUMO, ADMINISTRATOR
OF THE ESTATE OF JOYCE MUMO,

NORAH D. MOMANYI,
JOYCE G. MOMANYI,
DORIS K MOMANYI,
ALICE MUMO,
SABINA KAILU,
SCOLLA MWANZIA,
MULI MUMO,
PENINA JACOB, ADMINISTRATOR
OF THE ESTATE OF PRISCILA
MUMO,
JANE KAMENE, ADMINISTRATOR
OF THE ESTATE OF MARIA MUMO,
DANIAL MUTISYA,
ADMINISTRATOR OF THE ESTATE
OF MUTISYA MUMO,
FLORENCE WANJIRU KIRAGU,
JACINTA WANJIKU NJUGUNA,
GERALD NJAU KIRAGU,
PETER NJUGUNA KIRAGU,
GODFREY NDABU NJUGUNA,
CHRISTOPHER NDUNGU NJUGUNA,
ANASTASIA MUTHONI NJUGUNA,
PATRICIA ANN WANJIRU NJUGUNA,
LAURECIA NYAMBURA NJUGUNA,
JAMES NDUNGU NJUGUNA,
MONICA WAMBUI NJUGUNA,
SUSAN KALEKYE NZII,
WILSON NZII SONGOLO,
JANE SYOMBUA,

STANISLAUS MUTISYA NZII,
COSMAS MWEU NZII,
DAVID MUOKI NZII,
THOMAS MUTHUI NZII,
DENNIS KIKWAE NZII,
MUNIR HUSSEIN M. KARIMJEE,
RAZIYA M. KARIMJEE,
MANSURALI M. F. KARIMJEE,
MEHMUDA M. KARIMJEE,
KHYZEMA M. KARIMJEE,
DAVID MUNIU NJUGUNA,
LUCY MUMBI,
ZIPPORAH KABURA,
VERONICAH WANJIKU,
FRANCIS MUTI,
JOSEPH NJUGUNA MUNIU,
ELIUD IKOTE MEJA,
DAMARIS TEPERSON IKOTE,
MEJA OLE NCHOOKI,
RAHAB RIMANTO MEJA,
REGINA NESIAMO IKOTE,
FRANCIS MOOKE MEJA,
MARY NTETE PULEI PARAKU,
PAULINA LOUISE SIANTO,
AGNES SERETI MEJA,
LEAH NAIPERIA MEJA,

ALBERT TOPUA MEJA,
ISAIHIA KOINET MEJA,
SPTEPHEN TANTE MEJA,
CHARLES KABUI WANJOHI,
STANLEY WANJOHI MATHENGE,
STANLEY WANJOHI MATHENGE,
ADMINISTRATOR OF THE ESTATE
OF MARGARET NJERI,
PETER MATHENGE WANJOHI,
IRENE WANGARI WANJOHI,
RACHEL MUMBI MASEK,
JUDI WAIRIMU WANJOHI,
SUSAN NG;ENDO WANJOHI,
LUCY ANGWILI SEGERO,
ELIJAH CHURU MANYEKI,
LUCY MUTHONI KIMUHU,
GABRIEL KIMUHU WAHINYA,
MARY WAMBUI KIMUHU,
TANIA WAMBUI KIMUHU,
PETER WAHINYA KIMUHU,
PAULINE WANJIRU NGANGA,
JOYCE NDUTA KIMUHU,
JANE KABURA MULLE,
ALICE NJERI KIMUHU,
SAMUEL NYAUSE OKOTH,
MILLICENT CLARIS AKOTH,
CALEB NYAUSE,

FIONA ACHIENG OKOTH,
AGGREY NYAUSE,
EDWINA NYAUSE,
MARY SIJENYI,
DORIS ACHIENG NYAUSE,
POLYCARP OTIENO OKECH,
MARGARET WANJIKU RUKWARO,
ROBERT WAMBUGU RUKWARO,
IGNATIUS WAMBUGU RUKWARO,
MARY NYAKIAMBI RUKWARO,
RUTH RUKWARO,
BRETTA MUTHONI MUNGAI,
ADMINISTRATOR OF THE ESTATE
OF DAVID NJUGUNA MUNGAI,
BRETTA MUTHONI MWANGI,
EVA WANJIRU MUNGAI,
DOLLY NJERI MUNGAI,
NORAKABURA MUNGAI,
ALICE WAITWIKI,
FLORENCE NJERI WAWERU,
PETER MARI,
ANNE LEAH KASIVONA BUSAKA,
ANNE BUSAKA, ADMINISTRATOR
OF THE ESTATE OF MARITA
MUSIMBI JAMI,
ANNE BUSAKA, ADMINISTRATOR
OF THE ESTATE OF BARBARA
KAKIYA BUSAKA,
ALLAN BUSAKA,

MARTIN KIKUYU BUSAKA,
MARYANNE OBONDO GALLO,
EVANS OBANDO GALLO,
PATRICIA KAZIRIKA GALLO,
ANNE-MARIE GALLO,
PETER MBALUKA MUTHOKA,
AGNES K MBALUKA,
FAITH MORAA MBALUKA,
DAMARIS MWENDE MBALUKA,
ANITA OBERAI,
RAJINDER P OBERAI,
DEEPAK OBERAI,
NIKHIL OBERAI,
RINA SHAH,
ASHOK KAPOOR,
PETER NJOROGI GICHINGA,
GRACE WANJA GICHINGA,
JAMES LEE GICHINGA GICHINGA,
JOHN KIMANI GICHINGA,
JOSEPH GITHU GICHINGA,
MARTIN NGUGI GICHINGA,
CHARLES MUGO GICHINGA,
SAMUEL MUKUNA GICINGA,
CHARLES OBUNGU,
MILLICENT BUHYA,
JULIA ATIENO OBUNGU,

NELSON OBUNGU,
JACINTA OBUNGU,
HANAH NDUNGE NGUMBI,
TABITHA KAVINDU NGUMBI,
MATHEW MUTISO NGUMBI,
RHODA KAVINYA MUTUA,
ADMINISTRATOR OF THE ESTATE
OF GEORGE MUSEMBI NGUMBI,
JOEL NDAWA NGUMBI,
ALI MZEE GITHIMI,
ALI MZEE GITHIMI,
ADMINISTRATOR OF THE ESTATE
OF MZEE ALI,
HALIMA ABDALLA,
ABUBAK KAMAU ALI,
FATUMA NJERI ALI,
SAID MWANGI ALI,
GRACE EMILY KHISA,
ROSALIND WANJIRU WANYAGI,
PATRICK WANYAGI MURIUKI,
BRIAN MURIUKI WANYAGI,
CHRISTOPHER KABARE WANYAGI,
LETICIA NJERI WANYAGI,
JOSEPH MURIUKI KAMURA,
PETER MWANGI KIINIKI,
SUSAN WANJIRU KIINIKI,
CATHERINE WANJIRU THUKU,
DEDAN KAMAU GACHAU,

DAVID THUKU NDUMBI,
DAVID THUKU NDUMBI,
ADMINISTRATOR OF THE ESTATE
OF MARION GATHONI THUKU,
FELISTATS WAMBUI NJAU,
FLORENCE WANGUI THUKU,
KENETH KANGETHE THUKU,
ELIZABETH WANGUI THUKU,
JOHN NDUMBI THUKU,
CATHERINE NJERI MURIUKI,
ALFRED MAINA KANG'ARU,
FAITH MURIUKI,
E.M., A MINOR BY GUARDIAN,
CATHERINE MURIUKI,
NANCY WAMBUI GACHOKA,
JENNIFER WANGUI MAINA,
LUCY MUTHONI KARUOYA,
JANET WANJIKU MAINA,
JOHN MACHUA KARUA,
JOSEPH MBUGHUA MACHUA,
MARY KANYI MACHUA,
STEPHEN GACUMA KARUMA,
JOHN MUIMI MWANIKI,
ELIZABETH WAWEU MWANIKI,
MARY M. MWANIKI,
MARGARET MWANIKI,
FRANCIS MWANIKI,
ANN MWANIKI,

JOSEPH WAFULA BUYELA,
MARGARET NANJALA WAFULA,
ROBERT SIMIYU WAFULA,
LINDA NEKESA WAFULA,
THOMAS THUKU NGANGA,
ESTHER NYAMBURA MUNGAI,
MARY WANJIKU NGANGA,
GERTRUDE WAHU MBUGUA,
BERNARD NGANGA THUKU,
MARYANNE WANJIKU THUKU,
CECILIA WANJIRU NGANGA,
CHARLES MWANGI NGANGA,
NANCY MUGURE NGANGA,
SAMUEL KARAU NGANGA,
EUNICE NJERI NGANGA,
FRANCIS MBUTHIA NGANGA,
SUSAN MUTHONI NGANGA,
JOHN KAMAU WAMAKIMA,
GLADWEL KABURA,
BEATRICE DIAH,
JOHN DIAH,
BEATRICE DIAH, ADMINISTRATOR
OF THE ESTATE OF JOSEPH
BENJAMIN ARIWI,
JUDITH DIAH,
BRIAN DIAH,
JACQUELINE DIAH,

CHARLES OMONDI ARIWI,
JOHN ARIWI,
HOSEA ARIWI,
SHEM ARIWI,
WILLIS ARIWI,
PHYLLIS M. PORTER,
JONATHAN D. PORTER,
RUTH MARAGA SANYA,
BRENDA SANYA,
HARRIET SANYA,
LINET SANYA,
JANET NASIALI,
HILLARY SANYA,
FLORENCE SANYA,
MARGARET MARAGA YONGE,
HARUN K. NANDWA,
FLORAH LUKHOVI VUSARU,
JANE KHAGULI,
ROSE KHAGULI,
WANJIKU KARANJA,
LARENCE KARANJA,
TITUS KIRAGU,
SUSAN KIRAGU,
JULIANA NDANGAKARANJA,
MARIA WAMUCII KARANJA,
KARUSA KIRAGU,

PER CERNAL,
KARIUKI KIRAGU,
ALEX KIRAGU,
LAWRENCE KIRAGU,
GABRIEL KIRAGU,
JANE NYAMBURA WANDUI,
ESTHER WARIMI KAMAU,
JEREMY NJOROGI WANDUI,
ALBERT KAMU WANDUI,
MERCY WAIRIMU GICHUHI,
JENNIFER JEPKOSKEI CHEBOI,
JAMES KIBY CHEBOI,
MELANIE JEPTARUS,
RENEE JERUTO BIRIR,
JESSE KIPLAGAT BIRIR,
LILLIAN JERUTO,
JOAN JEMUTAI CHEBOI,
JOHN KARIUKI MACHARIA,
LOISE NYAMBURA MACHARIA,
JOHN MACHARIA,
ADMINISTRATOR OF THE ESTATE
OF ANTONY MACHARIA,
EDWIN KURIA MACHARIA,
MICHAEL MUNGA MACHARIA,
IMELDA NJERI MACHARIA,
LORNA NYAMBURA MACHARIA,
TERESIA WAIRUINI MACHARIA,

LYDIA MACHARIA,
JAYNE AWINO OLANDO,
GORDON N. OLANDO,
GRACE A. OGENDO,
ADAH S. OLANDO,
ALEXANDER G. OLANDO,
PAUL O. OGENDO,
JOYCE O. OLWEYA,
PHOEBE A. NYAGUDI,
ROSE A NYAMUNGA,
VICTOR AYIEKO MASBAYI,
CAROLINE WANJERI,
GEORGE ONGATA DANIEL,
RUTH EVERLYN ZEBEDEE,
RUTH ASIBIKO OKWOMI,
JAMES ALBERT OKWOMI,
ALFRED KAMWONO GEORGE,
JUDITH MALOBA,
JOSEPH AGGREY MALANDA,
ELIZABETH OKWOMI,
WILSON AKONGO ASIBIKO
OKWOMI,
JOSEPH KINYUANJUI,
MARY KINYUANJUI,
JOYCE KINYUANJUI,
LUCY KINYUANJUI,
MONICA KINYUANJUI,

IRENE NGENDO KINYUANJUI,
PAULINE WANJIKU KINYUANJUI,
NANCY WANJIRU KINYUANJUI,
WICYLIFE KINYUANJUI,
THERESIA WANGARI KINYUANJUI,
PATRICIA WANZALLA,
MARY A. OKELLO,
PAMELA A. WANZALLA,
ANNASTASIA WANJIRU,
ANNASTASIA WANJIRU,
ADMINISTRATOR OF THE ESTATE
OF NOAH KARUGA KOINANGE,
ANNASTASIA WANJIRU,
ADMINISTRATOR OF THE ESTATE
OF GRACE NGINA MACHUA,
PAUL KOINANGE,
FRED KARUGA,
NICHOLAS KOINANGE,
MACHUA KARUGA KOINANGE,
MILCAH NJENDO MACHUA,
TERESIA NDULU KILONZI,
PETER KILONZI MBITHI,
ADMINISTRATOR OF THE ESTATE
OF SAMUEL MBITHI NZAU,
PETER KILONZI MBITHI,
ADMINISTRATOR OF THE ESTATE
OF VERONICA TABITHA,
MUNYIVA MBITHI,
JANE NDIDA KILONZI,
MAGDALINE NTHENYA KILONZI,

VERONICA MUNYIRA KILONZI,
ROSE NTHAMO KILONZI,
RAELA MBULA MWTO,
ANJELINA BEATRICE MBITHI,
FLORENZIO NYAGA KABEBA,
BEATRICE MUTHONI NYAGA,
FLORENZIO NYAGA KABEBA,
ADMINISTRATOR OF THE ESTATE
OF FAITH NGUI,
ANTONY KABEBA NGAI MUVITI,
JOSHUA KIARO NYAGA,
GRACE NDEGI NYAGA,
JOHN NYAGA,
EUSTACE NYAGA NGAI,
BENSON MBURU NGAI,
THOMAS IRERI NGAI,
ANDRIAN NGUE NGAI,
NICETA WAKERE NGAI,
LILIAN ANYANGO,
COLLYMORE HILLARY OMONDI,
VALENTINE NYAWIRA,
PAUL KYALO MUSAU,
PAULINE MUENI MULWA,
JACKSON MUSAU KYALO MUSAU,
MERCY MBULWA KYALO,
DIXON OLUBINZO INDIYA,
DORCAS NEKESA WASIKE,

**JOHN INDIYA IMBUNYI,
ROSILIDA ONYONGE INDIYA,
ANDREW GRIFFIN INDIYA,
MICHAEL INDYIA JOHN,
FESTUS KENNEDY INDYIA,
BUBBA GEORGE NZOMO,
IRENE KANINI THANANGAH,
SAMUEL MUTHAMI KIVINDYO,
KASIOKA MULINGIA,
JULIANA MUTHIKE MULI,
JOYCE WANZA KIVINDYO,
DAVID KIVINDYO,
JOYCE WANZA,
JASMINE SYOMITI MUTHAMI,
JUMA MUTHAMI,
MULWA KIVINDYO,
MUSYOKA KIVINDYO,
MUSTAFA MOHAMMED ALI,
MERCY NYOKABI,
MOHAMMED TAJIR,
FARUQ MUSTAFA,
MAUA NYANDIA MUSTAFA,
AHMED MOHAMMED ALI,
JUMA MOHAMMED ALI,
MAHAMUD MOHAMMED ALI,
ZUENA MWATSAHU,**

SHAMSA MOHAMMED ALI,
JAMES MUTUA MUTUKU,
BERNEDETTE K. MUTUA,
CAROLINE M. MUTUA,
FRANCIS M. MUTUA,
PETER M. MUTUA,
TITUS KIVINDYO MUTUKO,
BONIFACE MUTUKO,
MATHEW MUTUKO,
ANAH NGAMI MUTUKO,
BENEDICT MUTUKO,
CATHERINE MALINDA,
CATHERINE MALINDA,
ADMINISTRATOR OF THE ESTATE
OF MARTIN MALINDA,
CATHERINE MALINDA,
ADMINISTRATOR OF THE ESTATE
OF JOSEPH NGUI MUETI,
MARGARET MAGIRI NGUI,
SARAH MALINDA,
TIMOTHY MALINDA,
SIMON NGUGI NGUI,
PETER CHINA MAGHIRI,
CATHERINE MALINDA,
ADMINISTRATOR OF THE ESTATE
OF TIMOTHY MUETI,
FREDRICK OGADA OBANGA,
FREDAH ADEMA LUSIMBA,
JENNIFERAGUYA LUSIMBA,

DOROTHY WIKHUNZA LUSIMBA,
SUSAN AMBUSO LUSIMBA,
SAMUEL AMADI LUSIMBA,
LEWIS LUSIMBA,
PATRICK MUTUKU MAWEU,
PHOEBE NDUKU MUNINI,
ANNAH WANJIKU MAWEU,
MARIANA WANJIKUN MUTUKU,
RUTH MUNINI MUTUKU,
MBULA MAWEU,
FRANCO NDETI MAWEU,
SILA MAWEU,
MWANGI MAWEU,
NJERI MAWEU,
FLORENCE MILDRED OWINO,
OLUOCH,
G.E. OWINO-OLUOCH,
SUSAN OWINO KIGAMWA,
DENNING JUSTUS OLUOCH,
FREDERICK E. OLUOCH,
JILL MITOKO,
MICAH OWINO OLUOCH,
DAVID ORIKO KWANYA,
RUTH NGICHO OBURA,
MAUREEN A. OLUOCH,
GLADYS MUTHONI WANJIRA,

WILSON MUIA KIAMBA,
LUCIA WANZILU MUIA,
NORAH KEKA MUIA,
MAUREEN KAVINDU MUIA,
VINCENT MUNYAO MUIA,
KEVIN KIAMBA MUIA,
RENSON NZAU KIAMBA,
MICHAEL MBITHI KIMITI,
CHRISTINE MBINYA MBITHI
KIMITI,
DAVID KIMITI MBITHI,
JULIANA NDUGE KIMITI,
GEORGE MUTISO KIMITI,
ROSE NDUKU MUTINDA,
ANITA NDUMI, ADMINISTRATOR OF
THE ESTATE OF MARGARET MUENI
KIMITI,
ESTHER WAGAKI MUCHIRI,
HEZEKIAH MWAURA GICHURE,
MICHAEL GICHURE MWAURA,
GABRIEL MWAURA,
CHRISTINA NJERI MWAURA,
DORCAS NYABERA,
TAITORO OMWANDA,
ADMINISTRATOR OF THE ESTATE
OF GRISTIANO OMWANDA
LITIEMA,
TAITORO OMWANDA,
ADMINISTRATOR OF THE ESTATE
OF MARIA SHINANDA,

CHARLOTTE ALWANGA,
SHARON AMWIRU,
KELVIN OMW ANDA MASANGA,
J.A., A MINOR BY NATURAL
GUARDIAN, TAITORO OMWANDA,
TAITORO OMWANDA,
ADMINISTRATOR OF THE ESTATE
OF DOMINIQUE LITIEMA,
SOFERIO CHIBOLE,
JOHN KIBE, ADMINISTRATOR OF
THE ESTATE OF PENINA WAIRIMU
KIBE,
JOHN KIBE, ADMINISTRATOR OF
THE ESTATE OF FRANCIS KIBE
NJUGUNA,
MARY NYAMBURA KIBE,
GEORGE NJUNGUNA KIBE,
HELLEN MBEERE KIBE,
ANN NYAKINYI KIBE,
MARGRATE WANJIRU KIBE,
JOSEPH MBUGUA KIBE,
FELISTIA WAMBUI KIBE,
PETERSON MUTUKU KIVUVA,
MARY MWANZA MAITHYA,
MARY MIKALI KIVUVA,
RAPHAEL KIVUVA MUTUKU
KIVUVA,
SAMUEL MAITHYA MUTUKU
KIVUVA,
AGNES NDUNGE MUTISYA,
SAMUEL MUTHAMA KIVUVA,

NZAU JOHN MUTULA,
JOSPHAT MUTULA KIVUVA,
ROSE NDUKU MURIITHI,
FLORENCE WANGECI KIOKO,
WINFRED WAMBUI GICHURU,
WINFRED GICHURU,
ADMINISTRATOR OF THE ESTATE
OF GABRIEL GICHURU KURIA,
WINFRED GICHURU,
ADMINISTRATOR OF THE ESTATE
OF VERONICA WANJIKU GICHURU,
PETER KURIA GICHURU,
CATHERINE NJERI,
DOMINIC WAWERU,
WINFRED GICHURU,
ADMINISTRATOR OF THE ESTATE
OF LAWRENCE KIMANI,
ROSELIDER ELENOR OTIENO,
ROSELIDER OTIENO,
ADMINISTRATOR OF THE ESTATE
OF MICHAEL F. OTIENO ONYANDO,
JUDITH JENNIFER NECHESA
ODWAKO,
STEPHEN OTIENO,
ROSELIDER OTIENO,
ADMINISTRATOR OF THE ESTATE
OF JOHN JUSTUS,
WESONGA ODWAKO,
FREDRICK WANGATIA ODWAKO,
JAMES ERIC OPONDO ODWAKO,
CATHERINE VIOLET ODHIAMBO,
FLORENCE MOYI ODWAKO,

ANN KUSERO,
FRANCIS SUAKEI KUSERO,
KENNEDY KISEMEI MUTHONGO,
ANGELA KUSERO,
ARNOLD KUSERO,
ALEX KUSERO,
RICHARD SIAMETO,
EZEKIEL MASEK,
HERIN CONNIE OTIENO,
EDWIN OTIENO OMBAJO,
EVANS C ODHIAMBO OMBAJO,
ALAN OTIENO,
ROSE OTIENO,
EDWIN OTIENO,
JOEL OMEDO OGADA,
REBECCA ATIENO OGADA,
LOICE ODIPO NYATENG,
HERIN CONNIE OTIENO, AS
ADMINISTRATOR OF THE ESTATE
OF BENJAMIN ALARO,
HERIN CONNIE OTIENO, AS
ADMINISTRATOR OF THE ESTATE
ASHA NDALO,
HERIN CONNIE OTIENO, AS
ADMINISTRATOR OF THE ESTATE
OF MARYO OLOO,
LINDA OKUDO,
ALFRED FREDRICK ODHIAMBO,
CLEOPHAS OMORO NYAN'GUTE,

TERRY AKOTH ODHIAMBO,
ALICE ADHIAMBO OUMA,
JOSEPH ODUOR OMORO
NYAN'GUTE,
CHRISTOPHER OWOR OMORO,
SAMWEL OBIERO OMORO,
SYLVESTER OMONDO OMORO,
MILDRED A. AHENDA,
PATRICK AHENDA,
JOHN AHENDA,
PETRONELA AHENDA,
JANET AHENDA,
BRIAN AHENDA,
JANE OMOLLO-OBUNGU,
EDITOR OBUNGU,
SUSAN OBUNGU,
JAIRO O. OBUNGU,
ROBERT F. GODEC,
LORI MAGNUSSON,
EUNICE KIHU,
EUNICE KIHU, ADMINISTRATOR OF
THE ESTATE OF JOTHAM KIHU
NGERO,
NANCY WANJIKU KIHU,
WACHIRA NDWIGA,
JOSEPHINE WANJIRU GETHI,
ESTHER NJERI MWANGI,
JENNIFER WANGARI KIBE,

CATHERINE WANGUI KIHU,
NICHOLAS NGERO KIHU,
GODFREY MAINA KIHU,
STEPHEN MWINGA KIHU,
NEWTON GITHAIGA KIHU,
WILBERFORCE WANJAU KIHU,
AGGREY N. ABUTI,
FLORENCE ABUTI,
STEYEN ABUTI,
BONIFACE ABUTI,
PEKES ABUTI,
PETER ABUTI,
FELIX MAKANYA ABUTI,
MERCY NASICHE ABUTI,
FRIDAH AUMA ABUTI,
FRANCIS AKAFWALE ABUTI,
THOMAS GAKOBOKURIA,
THOMAS GAKOBO KURIA,
ADMINISTRATOR OF THE ESTATE
OF LUCY WANJIRU GAKOBO,
ERASTUS MUTHU GAKOBO,
EPHRAIM KURIA GAKOBO,
NELIUS WAMBUI,
JOHN NDUTHA,
JAMES MAINAMACHARIA,
BANCY WACHUKA,
MAINAMACHARIA,

RUTH WANJIRU MAINA,
ANN NJAMBI MAINA,
ESTHER MIRIGO MAINA,
LILLIAN KENDI NJERU,
ADMINISTRATOR OF THE ESTATE
OF ALEXANDER CONSTANTINE
NJERU,
FAITH KAARI NJERU,
KENETH MBAABU NJERU,
LILLIAN KENDI NJERU,
LIZA MWENDE NJERU,
BRENDA NJERU,
SARAH NJERI,
PERIS KANGETHE,
ROBERT KANGETHE,
PAUL MBOGUA,
ACQUINATTA MUSONYE,
REDEMPTA ATIENO WERE,
RICHARD OMONDI OMONDI WERE,
DANIEL NYAKOKO OINGO,
TERESA ATIENO NYAKOKO,
CENTRICK OCHIENG NYAKOKO,
VINCENT OTHIENO NYAKOKO,
TONNY OMONDI NYAKOKO,
BONIFACE KIRIGIA,
ADMINISTRATOR OF THE ESTATE
OF JAMES KIMATHI KIRIGIA,
SUSAN WANJIKU WAWERU,
DAVID MWIRIGI KIMATHI,

ASHLEY KARIMI KIMATHI,
JULIUS NYABUTI MUGOYA,
TERESA MIRERA,
PASKARIA KEMUMA MUGOYA,
MUGOYA MUGOYA SAMSON,
GRACE BONARERI MUGOYA,
GEORGE OSORO MUGOYA,
PENINA MOKEIRA MUGOYA,
GEOFFRY BOSIRE MUGOYA,
DENNIS NYAKUNDI MUGOYA,
STELLA KEMUNTO MUGOYA,
THERESE NGATIA,
PETER MUCHIRI NGATIA,
PERIS MUTHONI MWANGI,
LONG M. NGATIA,
PAUL M. NGATIA,
DONALD M. NGATIA,
MARGARET W. MWANGI,
ANTONY MURIUKI,
BETH NJERI MWANGI,
GEORGE WAWERU KURIA,
JUNE N. WAWERU,
KURIA NJANG'IRIA,
CHARLES KURIA WAWERU,
MARGARET KURIA,
GRACE N. KURIA,

SIMON N. KURIA,
ROSE W. KUNG'U,
ISAAC KURIA,
HANNAH WANGUI KURIA,
KIZZIAH KURIA,
LYDIAH MWANGI,
RAHEL WANJIRA MWANGI,
GEORGINA WANJA WANJIRU,
HANNAH MUMBI MWANGI,
ESTHER GATHONI MWANGI,
FRANCIS WAMBUGU MWANGI,
JANE WANDIA KIBUGA,
EVANGELINE WAMUYU MWANGI,
PITY WARUGURU GICHIMU,
MURIUKI MWANGI,
GEOFFREY KARUKU MWANGI,
MICHAEL WAIGWA MWANGI,
SIMON MUNYIRI MWANGI,
MAUREEN CLARE WANJIKU AND
MARGARET WAMBUI KAIRO
WAIRIMU, ADMINISTRATORS OF
THE ESTATE OF JANE THERESA
KAIRO,
MAUREEN CLARE WANJIKU,
MARGARET WAMBUI KAIRO,
WAIRIMU,
POLYCAP OMONDI BONDO,
JUDITH AKOTH OMONDI,

BRENDA ADHIAMBO OMONDI,
TOBIA OKECH BONDO,
RAPHAEL IMBIAKHA OMWANGU,
MARY MASITSA IMBIAKHA,
RACHEL ASIKO ANYANGU,
ANGELA ANYEMBE,
DANIEL OMUKHABALI,
CAROLINE MUDASIA,
VATALIS ALWALA,
F.A., A MINOR BY GUARDIAN, MARY
IMBIAKHA,
I.A., A MINOR BY GUARDIAN, MARY
IMBIAKHA,
MERCY ANYANGO,
JOHN OTIENO OLOO,
PATRISIA AKINYI OTIENO,
GEORGE CHARLES ODUOR
OTIENO,
MATTHEW ONIANGO OTIENO,
ERICK ODHIAMBO OTIENO,
EUNICE ATIENO OTIENO,
FRACO OCHIENG OTIENO,
DAN WILIS ODUOR ALOO,
ROSE ANYANGO ALOO,
LILIAN AKINYI ALOO,
SETH MAKUMI,
JOYCE KATUNGE KITUMI,
MILDRED NDUNGE KITUMI,

RACHEL MUKULU KITUMI,
GEOFFREY MAKUMI KITUMI,
RECHO KALENDI MAKUMI,
SETH KITUMI MAKUMI,
ADMINISTRATOR OF THE ESTATE
OF MARTIN MAKUMI,
MARGARET THOKI MAKUMI,
ZIPORAH MUKAMI MAKUMI,
JESSICA LUNG' AHO,
MARY WANJIKU MBUTHIA,
MBUTHIA GICHUKI,
MARY WANJIKU MBUTHIA,
ADMINISTRATOR OF THE ESTATE
OF SARAH WAIRIMU NGANGA,
HENRY NGANGA KAMANO,
SUSAN NDUTA,
APOLLO JOEL NGANGA,
HOSEAH MICHENG NGANGA,
JAMES JOEL NJENGA,
EVERSON KABOGO NGANGA,
TIMOTHY JOWELL KAMANO,
ANN NJOKI GICHINGA,
MARY KAARI RUGENDO,
MATI KABUBU,
NORA MATI,
BRIAN MUTWIRI RUGENDO,
AYLEEN WANJA RUGENDO,
JOSPITER MURIITHI,

MEDRINE MUTHONI,
JAMES NDUNGU WAMBUGI,
LYDIAH WAIRIMU NDUNGU,
JOEL KAHUTU WAMBUGI,
ADMINISTRATOR OF THE ESTATE
OF MARY WANGARE WAMBUGI,
ESTHER NYAMBURA NDUNGU,
ROSEMARY WANJIRU NDUNGU,
VIRGINIA WANJIRU NDUNGU,
MILKAH GATHONI NDUNGU,
SUSAN WAMBUI NDUNGU,
JANE WAIRIMU NDUNGU,
GRACE NJERI NDUNGU,
FRANCIS GITAU NDUNGU,
BERNARD NJOROGE NDUNGU,
JOEL KAHUTU WAMBUGI,
MESHACK YIORE,
MARITHA JALENGA OMOJE,
ALICE KADENYI YIORE,
RUTH KAMGARI YIORE,
THOMAS KAVERENGE YIORE,
SUSAN MWANISA YIORE,
LINET MUHONJA YIORE,
EMMANUEL LUTUNGO YIORE,
MARY EBOSO,
GRACE ANDIDI,
JOHN MUNDI,

JANE MUTHONI WANGOMBE,
EUSTACE MUNDI M'THAMBU,
JERITHA IGOJI MUNDI,
MERCY WANJA MUNDI,
KEVIN KIMATHI MUNDI,
JOSEPHINE KAARI NJAU,
PATRICK MUGO MUNDI,
DENIS KINYUA,
EDWIN KARA,
MOSES OKWOMI,
HAMZA GIRNARY,
MARY REBECCA WANJA NDUATI,
LUCY KABURA NDUATI,
JOYCE KABURA WANJA,
BEATRICE WAIRIMU NDUATI,
NANCY MURUGI NDUATI,
ANNE WANJIKU NDUATI,
ESTON MACHARIA NDUATI,
JAQUELINE WAITHIKI NDUATI,
FAITH NJERI NDUATI,
SERAH NYAMBURA NDUATI,
JOSEPHINE NZILANI MUTHOKA,
HANNINGTON NDUNGA KIOLI,
JOSEPHINE NZILANI MUTHOKA,
ADMINISTRATOR OF THE ESTATE
OF ALICE MUTHOKA,
ERIC MUTHOKA,

HELEN KUTE,

**JOSEPHINE NZILANI MUTHOKA,
ADMINISTRATOR OF THE ESTATE
OF MARGRET MUTHOKA,**

MARIAM RAMADHAN,

ZAINABU WAMBUI RAMADHAN,

ISA MBUGUA RAMADHAN,

**JUMA KIMANI, ADMINISTRATOR
OF THE ESTATE OF FATUMA NJERI
RAMADHAN,**

**JUMA KIMANI, ADMINISTRATOR
OF THE ESTATE OF SAWN NJERI
RAMADHAN,**

JUMA KIMOTHU RAMADHAN,

MUSA NJIRU RAMADHAN,

ASMINI NJERI RAMADHAN,

ABDULRAHMAN GATHURU,

RAMADHAN,

HAMZA JUMA NYANYILE,

SIKITU HUSSEIN FUNGA,

AZIZ MOHAMED THOMAS,

SHEILA AZIZ MOHAMED,

PHILLIP JONATHAN POMONI,

JOYCE RENATUS,

LADISLAUS POMONI,

THOMAS ODHIAMBOONGORO,

SILPHER ATIENO ONGORO,

JOHNSON ONGORO,

MARGRET AWITI ONGORO,

**JACKLINE AUMA ONGORO,
DIANA ACHIENG ONGORO,
MICHAEL J.B. ONGORO,
CAROLINE AUMA ONGORO,
JANE ATIENO ONGORO,
FLORENCE ADHIAMBO ONGORO,
JOYVE ADOYO OKIKI,
TOBIAS SUDI ONGORO,
STEPHEN NJIHIA NDUNGU,
AGNES WANGUI MUTHAKA,
NDUNGU GACHOGO,
NJERI NDUNGU GACHOGO,
MARY WANJIRU NDUNGU,
PENINAH WAIRIMU NDUNGU,
SISILIA WAMBUI GATHII,
JANE WANGUI NJENGA,
GRACE WAITHIRA NDUNGU,
CHARLES NJOROGI NDUNGU,
REGINA WANGARI NDUNGU,
NAOMI WANJIKU NDUNGU,
ELIZABETH WANJIKU NDUNGU,
ROBERT MACHARIA MUNGAI,
GRACE WAMBUI MACHARIA,
IRENE NGINA MACHARIA,
RACHEL WANGUI MACHARIA,
PETER MUIRURI,**

MARGARET NJERI,
MERCY WANJIKU,
JOYCE WANJIRU,
ANN MUTHONI,
EUNICE WACHEKE NJERU,
DAVID NJERU KINYANJUI,
KENNETH KIARIE NJOROGE,
RUTH S. WANGUI NJERU,
MARGARET NJERI NJERU,
LUCY WAMBUI KIARIE,
MARY WANGARE KIARIE,
JEAN WAITHIRA KINYANJUI,
CATHERINE WAMBUI KINYANJUI,
EDWARD GITAU KINYANJUI,
MARY MUTHONI NDUATI,
LUCY MUMBI MWANGI,
JANE WAIRIMU NJUNG'E,
JANE WAIRIMU NJUNGE,
ADMINISTRATOR OF THE ESTATE
OF MARGARET WANGUI,
CAROLINE WANGUI WAIRIMU,
ESTHER WANJIKU NJUNG'E,
PAUL NJUGUNA NJUNG'E,
JIMMIE MUIGAI NJUNG'E,
GRACE WANGARI NJUNG'E,
SERAH WANJIKU NJUNG'E,
KAMAU MBUGUA,

PRISCILLA WANJIKU KAMAU,
DAMARIS WANJIKU KAMAU,
NANCY WAMBUI KAMAU,
ZACHARIA MBURU KAMAU,
PATRICK MUCHUGE,
FLORENCE MUEMA,
ALEXANDER MUEMA,
CAROLINE MUEMA,
LILIAN MUEMA,
SAMUEL MUEMA,
NANCY MWIHAKI KARANU,
GRACE WAMBUI MUIGAI,
JAMES KIMANI MUIGAI,
SAMUEL KARANU MUIGAI,
THOMAS NGURE MUIGAI,
MARY NDUKU MUNYAO,
REBECCA KANINI MUTISYA,
ELIZABETH WAWEU MWANIKI,
VERONICA MUTHEU MULWA,
MATHA KALOKI,
DAMARIS MICHAEL,
AGNES MONTHE MUTUA,
FLORENCE KHAUKANI ASHIKA,
WILBERFORECE AMAKOBÉ,
MURONO,
MOURINE ABISINWA MURONO,

ALICE LUBANGA MURONO,
SIMON NGINYA ANTHONY,
MERCY NGEMA NGIGI,
PETER WANYOIKE HINGA,
MARGARET WAITHIRA WANYOIKE,
LEONARD THAIRU WANYOIKE,
EVANS MUCHIRI WANYOIKE,
CATHERINE MWIHAKI WANYOIKE,
JACKLINE MUGURE MUCHAI,
JOSEPH CHEBOI,
ALICE JEPKEMEI BETT,
PENINAH WAITHERA WAIGANJO,
RACHEL WAIRIMU MUKUHA,
JEMIMAH WAIRIMU MWANGI,
FRANCIS MACHARIA NJUGUNA,
NAOMI NJOKI NJUGUNA,
SUSAN NJERI KARUGA,
JOSEPH MUKUHA NJUGUNA,
ESTHER WANJIRU KIBUI,
JOHN MACHARIA MUNGAI,
VERONICA WAMBUI,
JOYCE WANJIRU,
JOYCE WANJIRU,
HANAH MUTHONI,
LILIAN WACHERA,
CATHRINE NYIHA,

KEVIN MUNGAI,
PURITY WAMBUI MWAGANU,
BEATRICE IDACERA,
FRANCIS WAINAINA MUNGAI,
RUFUS NJOGU MUNGAI,
MARY WANJIRU CHIRA,
JOSEPH MWANGI MAINA,
HILDA NJOKI MAINA,
CYRUS CHIRA MAINA,
JAMES KIHARA MAINA,
PAULINE WANJIKU MAINA,
JACUILINE KHALIBWA,
ADMINISTRATOR OF THE ESTATE
OF THOMAS MUKHOBI ARUNGA,
VIOLET KHAHOMBI ARUNGA,
JACUILINE KHALIBWA,
FREDRICK LUVEMBA ARUNGA,
FELISTUS AYESA,
KEVIN MUKHOBI ARUNGA,
LUCY MWONGELI MULOKI,
MIRIAM BELTA MUMO,
SEBASTIAN MUTUNGA,
BRIDGID LTUMBI,
LUCIA NZAMBA,
VERONICA MUTUA,
ALFRED NDILE,
GRACE WAMBUI,

ANNE NJERI,
DAVID KANJA,
STEPHEN KUBAI,
JOHN NGUGI,
UNICE MUTHONI,
AGNES NDUKU MUEMA,
DAVID WAMBUA MUEMA,
JACKSON KILEE MUEMA,
ESTHER SYOKAU MUEMA,
JOEL MUTUKU, ADMINISTRATOR
OF THE ESTATE OF JOSEPH NGUTA
WAMBUA,
JOYCE NZILANI WAMBUA,
MERCY WANZA MUSAU,
ADMINISTRATOR OF THE ESTATE
OF ANNAH NTHOKI WAMBUA,
CHARLES MWEU WAMBUA,
SAMMY NGUTA WAMBUA,
WILSON WAMBUA NGUTA,
JOEL MUTUKU NGUTA,
DAVID MULLI MBITHI,
STELLAMARIS SYOMBUA MULLI,
PATRICK MWANGANGI MULLI,
JANE KANINI MULLI,
SIMON NZOMO MULLI,
MICHAEL NZAU MULLI,
REDEMPTA MWENDE MULLI,
JACKLINE MUTHEU MULLI,

FLORENCE OYENGA OKOTH,

JOSEPH OKOTH,

**FLORENCE OKOTH,
ADMINISTRATOR OF THE ESTATE
OF CEACILIA AURA OGOUY,**

ALVIN OBAMBO,

DOROTHY OKOTH,

SCHOLASTICA OKOTH,

IMELDA OKOTH,

VIVIAN OKOTH,

EVELYN OKOTH,

**BEATRICE WANJIRA KANYONGA,
ADMINISTRATOR OF THE ESTATE
OF REUBEN KANYONGA RUGWE,**

JOYCE WANJA KANYONGA,

MIRIAM WAMAITHA KANYONGA,

BEATRICE WANJIRU KANYONGA,

LUCY WAIRIMU KANYONGA,

NAOMI WAMBUI KANYONGA,

WILLIE RUGWE KANYONGA,

GRACESUSAN NKIROTE OKUBO,

GEORGE H. OKUBO,

**JOYCE KINYA MARANGU,
ADMINISTRATOR OF THE ESTATE
OF DAVID J. MARANGO,**

JOYCE K MARANGU,

JOY BARBARA H. OKUBO,

EUGENE MARIUS OKUBO,

**JOYCE KINYA MARANGU,
ADMINISTRATOR OF THE ESTATE
OF DAN PAUL MURIITHI,**

PETER MWENDA MARANGU,

STEPHEN MUTHOMI MARANGU,

MICHAEL MURIUNGI MARANGU,

CHRISTABEL KARIMI MARANGU,

FRANCIS HINGA NJUI,

CATHELINE WAIRIMU HINGA,

TABITHA MUGURE NJUI,

WINNIE MUGURE HINGA,

GRACE WANJIKU HINGA,

LILIAN WANJIRU HINGA,

LAWRENCE KINYANJUI HINGA,

REUBEN KIAMBUYTHI HINGA,

HANNAH MUTHONI HINGA,

JOHN MUYA KINYANJUI HINGA,

SURINDER KAPILA,

DINESH KAPILA,

VARUN KAPILA,

SHALINI BHUCHAR,

DANIEL MACHARIA MWANGI,

PURITY WANGUI MACHARIA,

MARY WANJIRU MWANGI,

MARY WANJIRU MACHARIA,

FRANCIS MWANGI MACHARIA,

MERCY MUTHONI MACHARIA,

VERONICA NDITI MULINGE,
SIMON NYAGII NGATIA,
ANASTASIA W. CHEGE,
MAGDALENE MUKAMI NGATIA,
DIANA MUKAMI NYAGII,
GRACE WANGUI NGATIA,
CECILIA WANJIKU NGATIA,
WINFRED WAHIGA NGATIA,
THOMAS MUHORO NGATIA,
LEONARD MWANGI NGATIA,
SAMUEL B. ISABOKE,
PATRICIA NYABOKE MASESE,
HEZRON NYARINDO ISABOKE,
NANCY KWAMBOKA ISABOKE,
JAPHET ONGAKI BHONDA,
RUTH MORAA ISABOKE,
LILIAN BOSIBORI ISABOKE,
ELIJAH JANAI ISABOKE,
ROSE WAITHIRA NYAGA,
PETER NYAGA MUNYI,
JOY MUKEN NYAGA,
FAITH MUTHONI NYAGA,
ROSE THUGURI KINUTHIA,
NEWTON EUGENE GATHONGU,
KIBUCHI,
RACHEL WARUGURU GATHUNGU,

**CYNTHY OLIVIA MUTHONI,
KINUTHIA,
EARL MWARIRI KINUTHIA,
FLOYD GATHUNGU KINUTHIA,
GEORGE KIBUCHI GATHUNGU,
CHRISTINE L. BISHOP,
SUSAN W GATHUNGU,
JOSEPH MUREITHI GATHUNGU,
PRISCILLA WAIRIMU KUNG'U,
MARIA MULLEI,
MUALUKO KIMUYU NDETO,
ADMINISTRATOR OF THE ESTATE
OF MALIA KAVINDO LAZARO,
ANTHONY NDUNDA,
JOSHUA KIOKO,
MARGARET MUENI NZIOKA,
JOHN KIBAGENDI MORIASI,
GLADYS KIBAGENDI MORIASI,
TERESIA BOYANI,
LYDIA NYAMOITA,
STEPHEN MORIASI,
JOSHUA MARORIA,
JERUSHA WAJIKU KARUTHIRU,
JANE WANGU MWANGI,
JONATHAN MAINA MWANGI,
JAMES NGUNYI MWANGI,
JOHN NGUNGIRI NGUNYI,**

JOYCE MUTHONI CHEGE,
ESTHER MUHINDI,
PETER KIMITI NGUNYI,
MUTANI NGUNYI,
JAMES MAINA NDIRANGU,
MARGARET WAMBUI MAINA,
PETER NDIRAGU MAINA,
MARTIN GITHUI MAINA,
CHARLES KAMAU MAINA,
PAUL WAHOME MAINA,
ISAAC MARSHELLE KATAKA,
HELLEN ADHIAMBO OLUOCH,
WILLIS OLUOCH KOSURA,
CORNELIA BANJA,
KELVIN OLUOCH OSURA,
FLORENCE ATHIENO OLUOCH,
MAUREEN ADHIAMBO OLUOCH,
MARTIN BANJA OLUOCH,
ROSEMARY ACHIENG,
VICTOR BANJA,
PAULINE BANJA,
FRANCIS NZANGI KITUTO,
FRANCIS MWORIA MWONGERA,
EMMA WAITHIRA MWAMBURI,
TONY NJUGUNA, ADMINISTRATOR
OF THE ESTATE OF FESTUS
NJUGUNA,

TONY NJUGUNA,
MARY NJUGUNA,
ALVIN NJUGUNA,
JOHN NJUGUNA,
NELSON NJUGUNA,
MICHAEL NJUGUNA,
ELIZABETH NYABOCHWA,
NYAMWARO,
ALOYS NYAMWARO,
CAROLINE NYAMWARO,
HELENNE NYAMWARO,
ROY NYAMWARO,
LILIAN NYAMWARO,
ANASTASIA MONAYO RATEMO,
LAWRENCE NYAMWARO,
MIRIAM NYAMWARO,
ESTHER KABURI,
DAVID KABURI,
JOHN KABURI,
JOYCE KABURI,
PAMELA ABUYA,
TERESA KABURI,
SIMON ONDERI ONYANCHI,
ADMINISTRATOR OF THE ESTATE
OF EZEKIEL ONYANCHI KABURI,
KENNEDY MOCHERE KABURI,

**JOSEPH MUCHOKI MANYEKI,
ADMINISTRATOR OF THE ESTATE
OF ELIUD MANYEKI MUCHOKI,**

PERIS W MANYEKI,

MARGARET KABURU MUCHOKI,

ANNAH WANJIRU MANYEKI,

JOSEPH MUCHOKI MANYEKI,

RUTH WACHUKA MANYEKI,

NANCY WANJIKU MANYEKI,

ALICE WAITHERERO MANYEKI,

NAOMI WAGATURI MANYEKI,

AGNES WANGUI MANYEKI,

GRACE WANJA MANYEKI,

**ELIUD MANYEKI WAKOJE
MUCHOKI,**

LAURA MUTHONI MUCHOKI,

ERIC MUCHOKI MUCHOKI,

BRENDA WANJIRU MUCHOKI,

**MANYEKI ERIC MUCHOKI,
ADMINISTRATOR OF THE ESTATE
OF WINNIE WANJA MUCHOKI,**

BENTA OSEA KAMIRE,

**BENTA OSEA KAMIRE,
ADMINISTRATOR OF THE ESTATE
OF PATRICK JULIUS KAMIRE,**

ISABELLA AKO OGUCHE,

EVELINE ACHIEN KAMIRE,

GAUDENSIA AKINY KAMIRE,

MICHAEL KAMIRE,

LUCY ADHIAMBO KAMIRE,

JANE ATIENO ODESSEY,
PAULINE ANIANGO OGUCHE,
BERNARD OTIENO OGUCHE,
MICHAEL OGUCHE,
BEATRICE WANJIRU WACHIRA,
JOHN ADAGALA KAVAGI,
RUTH MUTHONI WACHIRA,
PAUL WACHIRA GITHU,
EDITH WAMBUI WACHIRA,
MARGARET WANGARI WACHIRA,
JOYCE GATHIGIA WACHIRA,
EMA WAIRIMU WACHIRA,
ANNE MWAMBURI ONDENG,
AMINA MOHAMED HAJI,
EVANS OLWAL,
MOSES THURURA,
AGNES NJOKI THURURA,
MARTHA WANGUI GICHEGE,
JOLLYN WANGUI THURURA,
DENIS KIRAGU THURURA,
CATHERINE THURURA KAISER,
PHILIP GICHEGE,
STEPHEN KIBERA,
ROSE LINDA OKUDO,
RUTH OKUDO,
PETER JURA OKUDO,

ANNA SHAW,
SALLY OKUDO,
GRACE OKUDO,
NORMAN OKUDO,
GRACE AGENG'O,
JOYCE ONYANGO,
PERIS NYAWIRA THAIRU,
ESTHER WAMBUI THAIRU,
MARTIN MAINA THAIRU,
CAROLINE WAMBUI THAIRU,
JAMES MUNGAI GATHECA,
BONIFACE KINYAJUI GATHECA,
SIMON NGIGE GATHECA,
WILLY NDONDO KIOKO,
PETER GITUNDU,
KSIA NYOKABI GATUNDU,
LILIAN NYAMBA GITUNDU,
ESTHER WANJA GITUNDU,
PERIS WANJIKU GITUNDU,
MICHAEL KAMAU GITUNDU,
MARGARET WANGUI GITUNDU,
JANE WAIRIMU KIRAGU,
FLORENCE WANJIKU WAIREGI,
MARY MWIHAKI KIRAGU,
ELIJAH AMACHARIA KIRAGU,
JOHN MWANGI MBURU,

JANE NJERI GITHU,
TABITHA MBURU, ADMINISTRATOR
OF THE ESTATE OF HENRY MBURU
NGARACHU,
TABITHA WANGUI MBURU,
HENRY MBURU MWANGI,
SYLVIA WANGUI MWANGI,
NICHOLAS KARIUKI MBURU,
MARY MUTHONI MBURU,
JAMES WAMBUA HAMISI NDEMWA,
ELIZABETH NTHENYA KALULU,
ZIPPORAH NZILANI WAMBUA,
MASHAKA MAARIFA WAMBUA,
YUSUFU LULE WAMBUA,
WASHINGTON KIBWANA
WAMBUA,
JUSTUS SAMBA WAMBUA,
PAULINE WANJIRU KAMUTI,
ADMINISTRATOR OF THE ESTATE
OF PATRICK KAMUTI KAMAU,
PAULINE WANJIRU KAMUTI,
CHARLES KAMAU KAMUTI,
LUCY NJERI,
FLORENCE THITHU,
JANE WANJIKU KAMUTI,
MARTIN NGUGI KAMUTI,
VINCENT MURIA IGIRI KAMUTI,
KEZIA ORINGO OMINDE,
ADMINISTRATOR OF THE ESTATE
OF SAM OMINDE DURO,

KEZIA ORINGO OMINDE,
MICHELLE AKINYI OMINDE,
LASHON ACHIENG OMINDE,
MERCY THABITHA DURO,
SARAH WANGARI MWANGI,
JONAH MWANGI GITAU,
SARAH WANGARI GITAU,
ANN NJERI GITAU,
GEORGE NGARURIYA GITAU,
SIMON CHEGE MWANGI,
ALLAN MURIU MWANGI,
JOSEPH THUO MWANGI,
NAOMI NJERI MWANGI,
TOM LUDWARO CHOGO,
JIMMY MULEI,
NJOKY MULEI,
JIMMY MULEI, ADMINISTRATOR
OF THE ESTATE OF SAMMY MULEI,
JIMMY MULEI, ADMINISTRATOR
OF THE ESTATE OF NAOMI MULEI,
JAMES MUTUA MULEI,
GEORGE KIVINGI MULEI,
CHRISTOPHER LOKI MULEI,
ROSSY NDUMI MWALIMU,
ADMINISTRATOR OF THE ESTATE
OF FRANCO DENIS NZILO,
ROSSY NDUMI MWALIMU,
HANNAH KILITI MUNYASIA,

PARMENAS NZILU MUNYASIA,
ANNE KANTANU MUTHINZI,
MAUREEN VIATA MUTHINZI,
YVONNE MARTHA MUTHINZE,
NATASHA KOKI, ADMINISTRATOR
OF THE ESTATE OF GIBSON
MUNYASIA NZILU,
DEREK WAMBUA MUNYASIA,
RUTH MUTUA, ADMINISTRATOR OF
THE ESTATE OF OSCAR KILII
MUNYASIA,
SAMMY MUNYASIA NZILU,
FLORENCE MUNYASIA,
EMMAH MUNYASIA,
EUNICE MUNYASIA,
POLYCARP AGWINGI MBURO,
FRANCO SEACO,
PAUL MUKUI CHEGE,
LYDIA NYAKIO,
SAMUEL CHEGE MUKUI,
GRACE WAIRIMU MUKUI,
STEPHEN KIMANI CHEGE,
ELIZABETH WANJIRI CHEGE,
MARGARET NJERI KIONGERA,
JOAN MUTHONI CHEGE,
ZACK RATEMO,
ESTER RATEMO,
RISPER MAYAKA,

**PATRICK SAMSON MWENDWA,
BLANTINA ANNA SAMSON,
THAVU MWENDWA MALUSI,
JOHN MWENDWA SAMSON,
ANGELA FELISTUS THAAVU,
SAMSON,
CATHERINE NZAMBI SAMSON,
CHRISTINE SYOKAU SAMSON,
STEPHEN KAMWENGA MWENDWA,
DOUGLAS KATUMO MWENDWA,
FELISTUS SELINA MWENDWA,
ANTONY MUTIA MWENDWA,
MORIS MUTUA MWENDWA,
JANE MWENDWA,
URSULA BRAGANZA,
URSULA BRAGANZA,
ADMINISTRATOR OF THE ESTATE
OF TIMOTHY A. BRAGANZA,
JULIET A. BRAGANZA,
ALLAN BRAGANZA,
IAN BRAGANZA,
EUNICE FATUMA KIMBWARATA,
JOHN MANENO,
EUNICE KIMBWARATA,
ADMINISTRATOR OF THE ESTATE
OF RICHARD KIMBWARATA
LOROGHWA,
EUNICE KIMBWARATA,
ADMINISTRATOR OF THE ESTATE
OF ESTHER KITONDO KIBWARATA,**

SAWA MANENO,

PETER MWARE KIMBWARATA,

**EUNICE KIMBWARATA,
ADMINISTRATOR OF THE ESTATE
OF MARY MAIMERI KUBO,**

HOPE MAIENDERA MRUTTY,

**EUNICE KIMBWARATA,
ADMINISTRATOR OF THE ESTATE
OF DORCAS NYANGUGKA
KIMBWARATA,**

JACKSON KENIO KIMBWARATA,

SOPHIE M'BORA KIMBWARATA,

JANE KIICARARA KIMBWARATA,

SOLOMON MAITAI KIMBWARATA,

SHALETH NASHANGAI,

PIETROLUNGO,

JENIPHER BWAMULA,

MIRIAM KAGEHA CHOGO,

**JENIPHER BWAMULA,
ADMINISTRATOR OF THE ESTATE
OF VIGINTER MGEHA NDEDA,**

JULIANA SAGINA NDEDA,

WILLIS AZERE NDEDA,

TODD KAYATIN NDEDA,

MARGARET KAVAYA,

JUDITH MIDEVA,

SYLVIA OWIRA,

**PHILIPS ASUSA, ADMINISTRATOR
OF THE ESTATE OF AGUSTINE
ASUSA AUSA,**

KELEMENTINE AYIEKO,

BRIAN ASUSA,
VINCENT OWINO ASUSA,
JULIA AUMA ASUSA,
PHILIPS ASUSA, ADMINISTRATOR
OF THE ESTATE OF MONICA
ATIENO OCHIENG,
PHILIPS ASUSA, ADMINISTRATOR
OF THE ESTATE OF CHARLES
ODHIAMBO ASUSA,
LOISE WAIRIMU MURIGIA,
KEVIN CHEGE MURIGIA,
DESMOND IRUKU MURIGIA,
FAITH WAHITO NGURE,
LUCY MYAMBURA WAIGANJO,
GEORGE KIMONDO CHEGE,
JACKSON NGOTHO GITHOGORI,
EUSTACE MWANGI GITHOGORI,
ESTHER NJOKI GITHOGORI,
MWENDE MITAU,
EUNICE WANGECI WAWERU,
RUTH NZUKA WAWERU,
WINNIE NJOKI WAWERU,
STEPHEN MWANIKI NJAGI,
PETER KARIUKI NJAGI,
DAVID MUCHIRI NJAGI,
ANDREW NDABIRI NJAGI,
FLORENCE WAGERWE NJAGI,
MARY MUTHONI NJAGI,

MARY VUTAKWA MWALE,
DAVID KHEITSI MWALE,
NANCY KHADIOLI MWALE,
RUTH MAKHUNGU MWALE,
CLINTON LITWAJI MWALE,
BRIAN NDOMBI MWALE,
FANUEL MBUSIA MWALE,
AGNES WAITHIRA MBURU,
LEAH WAITHERERO MBURU,
MACHARIA MBURU,
JAMES MUIRURI MBURU,
MARK KARANJA MBURU,
MWANGI MBURU,
DAVID NGANGA MACHARIA,
JOSEPH MWANGI MACHARIA,
NIRAJ SHAH,
DILIP SHAH,
GOVINDINI SHAH,
ROHAN SHAH,
RUHANI SHAH,
MARGARET WANGUI NJOROGE,
MARY NJERY MUSYIMI,
EDWIN NJOROGE MUSYIMI,
TIMOTHY KILONZO MUSYIMI,
AGNES CAROL MUSYIMI,
ANN MUTHEU MUSYIMI,

PHILP KIOKO MATHEKA,
ROSEMARY NDINDA KIMANI,
JOSEPHINE MBITHE MATHEKA,
KIOKO MATHEKA,
AGNES MUSYIMI, ADMINISTRATOR
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MUSYIMI,
PHILISPHER NJOKI MUCIRA,
FLORORA WARUI MUNYI,
NOAH KARURI MUCIRA,
JOSPHAT MURIITHI KARURI,
DANIEL MUTHIKE MUNYI,
SYMON MACHAI MUNYI,
BONIFACE GACOKI MUNYI,
ESTHER WAKUTHI MUNYI,
BETH WANJIKU MUNYI,
JANE WAIRIMU KAMAU,
PATRICK NJUGUNA KAMAU,
MARGARETWAMAIITHA KAMAU,
NAOMI WAMBUI KAMAU,
ZIPHORA WAJIRIMU KAMAU,
HARNNAH NYAMBURA KAMAU,
PRISCILLA OLESIA OPANGA,
JOHN OPANGA OMUKWEI,
EFA SAKWA OPANGA,
PHILIP SAKWA OPANGA,
ABRAHAMAMBUNDO OPANGA,

NASHON WESANZA OPANGA,

SAMSON MILIKAO OPANGA,

**ANNE ODINGA, ADMINISTRATOR
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HAYIRA ODINGA,**

**ANNE ODINGA, ADMINISTRATOR
OF THE ESTATE OF LUKAS OKELO
SEWE,**

**ANNE ODINGA, ADMINISTRATOR
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OBWANGO,**

KEVIN OTIENO ODINGA,

EDWARD TED ONYANGO ODINGA,

SEAN OMONDI ODINGA,

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**ANNE ODINGA, ADMINISTRATOR
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OKELO,**

**ANNE ODINGA, ADMINISTRATOR
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OMANJE OKELO,**

PAULINE ACHIENG ORAYO,

**FANUEL ONYANDO,
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HABERT ONYANDO OKALL,

VIVIAN AKOTH OKALL,

JENNIFER NYOKABI KIMANI,

**FRANCIS NJAU, ADMINISTRATOR
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KINYANJUI MURIMA,**

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SAMUEL MURIMA KINYANJUI,
JOHN MBUGUA KINYANJUI,
SERAH WANJIKU KINYANJUI,
ANNE WAMBUI KINYANJUI,
RUTH WAITHERA,
LUCY KARIMI,
SYLVIA WANJA,
KELVIN KIMANTHI,
FAITH KARENDI,
VINCENT KITHUCI,
HENRY NYANCHOKA,
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HENRY NYANCHOKA,
JOHN JOSEPH OSAMO,
AGNES OSAMO,
HENRY NYANCHOKA,
ADMINISTRATOR OF THE ESTATE
OF JUNE BITUTU NYANCHOKA,
KEVIN AKEYA NYANCHOKA,
LINDA MORAA NYANCHOKA,
VIONA KWAMBOKA NYANCHOKA,
SANDRA NYABOKE NYANCHOKA,
ANDREW YOUNG ONDUMA,
NYANCHOKA,
JAMES PETER OSAMO,
GEORGE WILLIAM OMWAGAH,

KENNETH GODFREY OSAMO,
ROSE LEONA OSAMO,
STEPHEN ORENGE OSAMO,
ANNIE WANGUI KARURI,
SOLOMON GATITU WAIGURU,
MARY WANJIKU KARURI,
IRENE KIBATI,
GILBERT MACHARIA,
DANIEL MWANGI KARIUKI,
ADMINISTRATOR OF THE ESTATE
OF JOSEPH KARIUKIMWANGI,
ALICE WANJA KARIUKI,
RUTH WAMBUI KARIUKI,
REBECCA WANGUI KARIUKI,
DANIEL MWANGI KARIUKI,
JANE MAGIRI KARIUKI,
CHRISTOPHER MAINKAI MEJA ,
EUNICE TUPANKA MAINKAI,
SYLVIA SIMALOI MAINKAI,
SILVESTER SIRONKA MAINKAI,
JOHNSON MWANGI MAINA,
DATHAN MARIRA MAINA,
JOHN MUGO MAINA,
TABITHA WANGECHI MAINA,
HELLEN WANGUI NJENGA,
MONICAH SYOMWENDWA MUTIA,
ARON MWENDWA MUTIA,

TONNY MUSYOKA MUTIA,
ANITA MWATIHI WAMBUA,
EVALYN KALUMU MUTIA,
ERIC MBISI MUTIA,
MAIKI ATHMANI, ADMINISTRATOR
OF THE ESTATE OF
ABDULRAHMAN RAJAB,
JAMILA JUMA,
KALSUM SULEIMAN,
IBRAHIM ABDULRAHMAN RAJAB,
YASSIN ABDULRAHMAN RAJAB,
MAIKI ATHMANI,
HASSAN ABDULRAHMAN RAJAB,
JOHN NZUSYO MBINDYO,
ESTHER MBULA NZUSYO,
BONIFACE MULI NZUSYO,
PETER KYALO JOHN,
AMOS MUOO NZUSYO,
JACKLINE MUTHINYE NZUSYO,
ONESMUS NYAMASYO NZUSYO,
FRANCIS MWENDWA,
ADMINISTRATOR OF THE ESTATE
OF ROSE MUENI NZUSYO,
MUTHEU NDUNGE,
ADMINISTRATOR OF THE ESTATE
OF SERAH NDUNGE NZUSYO,
TERESIA WAMAITHA THUMBI,
ADMINISTRATOR OF THE ESTATE
OF JOSEPH THUMBI KIMANI,
MARGARET WAIRIMU THUMBI,

TERESIA WAMAITHA THUMBI,
ALICE NDUTA THUMBI,
GEORGE KAMAU KIMANI,
SEBASTIAN MWANGI NDERI,
LOISE TUMAINI MWANGI,
SAMUEL MURIUKI GAKINYA,
LYDIA WANJIRU MURIUKI,
LAWRENCE NDERI MWANGI,
BEATRICE WANJIRU MWANGI,
PETER GITHIJI MWANGI,
KENNETH NJOROGE MWANGI,
JOSEPH MURITHI MURIUKI,
JANE NJERI NDERI MWANGI,
PETER MAINA MURIUKI,
ZACHARI KINYUA MURIUKI,
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BENJAMIN SILA NDETI,
ANGELA IKAMBA IRERI,
ADMINISTRATOR OF THE ESTATE
OF STEPHEN KIMANI MUTAMBO,
ANGELA IKAMBA IRERI,
ONESMAS MUTAMBU GITAU,
SYLVIA WANGARU KIMANI,
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MC LAWRENCE OKELLO ODUOL,

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MARY ASIALA OWUOR,

**STEPHEN ODUOL, ADMINISTRATOR
OF THE ESTATE OF JOSEPH
MUSIALA ODUOL,**

**STEPHEN ODUOL, ADMINISTRATOR
OF THE ESTATE OF CHRISTOPHER
OLOO ODUOL,**

MAURICE NGESA ODUOL,

**STEPHEN ODUOL, ADMINISTRATOR
OF THE ESTATE OF JENIPHER
AKINYI ODUOL,**

ESTHER WAMBUI KIBE,

**ESTHER WAMBUI KIBE,
ADMINISTRATOR OF THE ESTATE
OF KIBE KIGARA,**

**ESTHER WAMBUI KIBE,
ADMINISTRATOR OF THE ESTATE
OF RAHAB WANGUI KIBE,**

ANN-FAITH BIRUNGI,

SAMUEL KISEMBO KASANGAKY,

GRACE WAMBUI KARIUKI,

**GRACE KARIUKI, ADMINISTRATOR
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KARIUKI MUCHOKI,**

**GRACE KARIUKI, ADMINISTRATOR
OF THE ESTATE OF ELIUD
WAICHIGU MUTUHU,**

**GRACE KARIUKI, ADMINISTRATOR
OF THE ESTATE OF JANE MUTHONI
WAICHIGU,**

CHARLES KANANGA KARIUKI,

SYLVIA WANJIRU KARIUKI,

KEVIN WAICHIGO KARIUKI,

MARY WANGARI KURIA,

CLEMENT WACHIGO KAMBO,

PATRICK KIUNJURI WACHIGO,

CHARLES CHEGE WACHIGO,

SAMUEL KAMAU WACHIGO,

JOHNSON KIARIE WACHIGO,

ESTHER GITUTU WACHIGO,

DAVID MWANGI WACHIGO,

**GRACE KARIUKI, ADMINISTRATOR
OF THE ESTATE OF BENSON MANIA
WAICHIGO,**

**CHRISTOPHER GACHANJA,
ADMINISTRATOR OF THE ESTATE
OF GODFREY GACHANJA
WAICHIGU,**

ELIZABETH WANGUI GACHANJA,

HUMPREY WAICHIGO GACHANJA,

CHRISTOPHER CHEGE GACHANJA,

ANTONY MWANGI GACHANJA,

SAMUEL KIMOTHO GACHANJA,

DAVID KAMBO GACHANJA,
LUCY WANJIKU GITAU,
LUCY WANJIKU GITAU,
ADMINISTRATOR OF THE ESTATE
OF JAMES MWANGI GITAU,
DICKSON GITAU MWANGI,
MARY WANGATURI GITAU,
JANE MUTHONI GITAU,
CAROLINE NJERI GITAU,
EVERLYN WANJIRU GITAU,
SYLVIA WANJERA GITAU,
CEPHAS ODHACH AGOLA,
JANE AUMA AGOLA,
ROSEBELLA A AGOLA,
PAUL O AGOLA,
RHODA A AGOLA,
CAROL A AGOLA,
SERAH WANGUI GACHIE,
JACKSON MUIRU GACHIE,
PHYLLIS MUTHONI GACHIE,
STACY WAIRIMU GACHIE,
JULIE NJOKI MUMBI,
FAITH NJERI GACHIE,
PATRICK MUIRU GACHIE,
KENNETH MWANGI GACHIE,
JANE WANJIRU GACHIE,
DANIEL NJONGE GACHIE,

WINNIE MUMBI GACHIE,
FLORENCE MUENI MBITHI,
ADMINISTRATOR OF THE ESTATE
OF FITZHARIS MULINGE MBITHI,
FLORENCE MUENI MBITHI,
RAEL MBULA MULINGE,
CELESTINE MUTHEI MULINGE,
GREGORY NNDUNDA WAMBUA,
FLORA NTHENYA NDUNDA,
MONICA NDUKU WAMBUA,
ANGELA NDUKU NDUNDA,
ROBERT MUNYAO NDUNDA,
GABRIEL KYALO WAMBUA,
STEPHEN MUTIE WAMBUA,
JOHN MWANIA WAMBUA,
ANASTASIA MWIKALI WAMBUA,
CHRISTINE MBITHE WAMBUA,
BERNARD MUNYAO WAMBUA,
LUCIA WANZA WAMBUA,
PIUS KIOKO WAMBUA,
FRANCIS MWANGEI WAMBUA,
PATRICIA MWOTI WAMBUA,
JACINTA MUTILE WAMBUA,
CATHERINE WAVINYA WAMBUA,
SILVESTER NZIOKA WAMBUA,
ALPHONSE MULWA WAMBUA,
MARTIN MUSYOKI WAMBUA,

PHOEBE MUKULU NGONZI,
RICHARD KYALO NDEMWA,
PHYLLIS KAKENE NDEMWA,
BATHSHEBA ONGORI,
FRANCIS ONGORI,
ALFRED ONGORI,
BENEDICT ONGORI,
CAROLINE MUHANDALE ONGORI,
DOROTHY COBBIN,
EVALINE ONGORI,
FIONA ONGORI,
DAVID ROBERT NYAGWOKA
MBOGA,
REBEKA OBWAYA,
ESTHER NGARE,
ISABELLA K. MAISIBA,
CHARLES MAISIBA ONCHONG'A,
JERUSA MORAA MAISIBA,
JAMES O. MAISIBA,
EVANS G. MAISIBA,
GILBERT N. MAISIBA,
TOM K. MAISIBA,
JOYCE K. MAISIBA,
GLADYS M. MAISIBA,
JACOB NDOLO NGEMU,
MARY NGINA NDOLO,
PETER NGEMU NZALAI,

AGNESS NDILA NGEMU,
KIMEU NDOLO,
MULEI NDOLO,
JOSEPHINE NDOLO,
JAMES SAKWA,
JOSEPHINE NDOLO,
ADMINISTRATOR OF THE ESTATE
OF DAN NDOLO,
FLORENCE NOOLO,
MARISELLAH WAFULA,
FLORENCE WAFULA,
SARAH WAFULA,
LEVY WAFULA,
BARAKA WAFULA,
ANDREW NDOLO,
PHILIP NDOLO,
HENRY NDOLO,
JACKLYNE DEBORA ODARI,
JOSEPH NDOLO,
LUSIMBA RAGUE,
LUSIMBA RAGUE, ADMINISTRATOR
OF THE ESTATE OF JUVENALUS
RAGUE,
LUSIMBA RAGUE, ADMINISTRATOR
OF THE ESTATE OF TERESA
RAGUE,
VINCENT RAGUE,
CONSOLATA RAGUE,
MARIE RAGUE,

**JUVENALUS RAGUE,
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OF JOHN RAGUE,**

MARGARET MUMBI GITAU,

**MARGARET GITAU,
ADMINISTRATOR OF THE ESTATE
OF FREDRICK MUIRURI GITAU,**

**MARGARET GITAU,
ADMINISTRATOR OF THE ESTATE
OF ELIZABETH THUIYA WAWERU,**

GODFREY MUIRURI GITAU,

VIRGINIA NJERI GITAU,

LUCY WAITHERA WAWERU,

MARY WAITHERA GATHECHA,

**ANTHONY KARUMBA,
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OF ANN NJOKI KAMAU,**

JANE WAMBUI KINUTHIA,

ALICE WAKANYI WAWERU,

GRACE NJAHIRA JORAM,

JOHN MBURU WAWERU,

JOSEPH KANYUIRA WAWERU,

GABRIEL NJENGA WAWERU,

SAMUEL KARUGI WAWERU,

TIMOTHY KIBET MUTAI,

LISA WANJIKU GICHERU,

EDWARD KIPKORIR KIBET,

DANIEL KIPLIMO KIBET,

NELSON MARIE K. KIBET,

STANLEY NJOROGI,

JUDITH WALUGHA MWAMBI,
JOSEPHINE MUTHONI NJOROGE,
LILIAN MKANDOE NJOROGE,
YUVENAL MACHARIA NJOROGE,
SAMUEL KAMANDE NJOROGE,
FAITH WANJIKU MUTHONI,
SERAPHINE NJERI MUTHONI,
LUCY WANJIKU NDUNGU,
BENSON NDUNGU KAMAU,
RUTH WANJIRU NDUNGU,
IAN KAMAU NDUNGU,
FREDRICK MURIHIA KANGETHE,
MUNGAI KANGETHE,
WINNIE NYAKIO WAINAINA,
NANCY WAMBUI IKINU,
MARGARET ODHIABO,
JAMES KANGETHE,
MONICAH NJENGA,
FRANCIS NJENGA KAMITI,
MARY WARUCU NJENGA,
HILDA NYAKONA AMAPANGA,
FLORENCE ESTABLE AMAPANGA,
CHARLES AMAPANGA,
JORAM ALUVENED AMAPANGA,
MARGARET N. AMAPANGA,
SIMON INYANGALA BOAZ,

ZAKARIA OMBATO AMAPANGA,
FANUEL ANDOBE AMAPANGA,
PRISLA ORONGA OMUSULA,
NOEL ANDESO BWANAMO,
MAURA BARRY BOYLE,
EDMOND BOYLE,
ISAAC KIPROTICH KUTO,
EMMY C. KUTO,
ISAIAH K. KUTO,
SAMUEL K. MAGUT,
BARNABAS R. SIRMA,
JONATHAN K. KUTTO,
ISAAC KIPROTICH KUTO,
ADMINISTRATOR OF THE ESTATE
OF RODAH K. SIRMA,
ISAAC KIPROTICH KUTO,
ADMINISTRATOR OF THE ESTATE
OF DAVID KIBET KUTTO,
PETER ORINA,
HELDAH KERUBO MASIRA,
MILKA NYOBOKE NYAKANGA,
JERUSA NYAMOITA OMayo,
ELIJAH ORINA NYANDWARO,
ROBERT OBUBA OSORO,
MORRIS MACHAMA,
KEREMENSIA MORAA OSORO,
DENNIS OSORO,
FREDDY OSORO,

PRISCA OSORO,
HELLEN OSORO,
EDNAH OSORO,
LYDIAH OSORO,
JACINTA OSORO,
EMMANUEL OMENDA,
MARY ADHIAMBOJOSEPH,
JOSEPH OTIENO OMENDA,
EMMANUEL OLOCH OMENDA,
JOHN OTIENO,
ROSEBELLA ANYANGO,
LIVINGSTONE MAINA NDONGA,
JANIFFER WANJIRU MAINA,
FREDRICK NDONGA MURIITHI,
GRACE WANJIRU NDONGA,
FREDRICK NDONGA MAINA,
REUBEN MWANGI MAINA,
G.N.M., A MINOR BY NATURAL
GUARDIAN, LIVINGSTONE MAINA
NDONGA,
GEORGE NDIRITU NDONGA,
JANET GATHONI MAINA,
HANNAH WARUKIRA WAIGANJO,
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EVERLYNE WAFULA,

MICHAEL CHEPKOTO WAFUBO,

CECILIA CHIMOLI BUSIEKA,

WILSON MULINGE,

JANET WANZA MUTUKU,

PHILIP MALILE MAWEU,

JOSEPHINE KATUMBI PHILIP,

GEORGE MORARA MAKORI,

ISABELLA MORARA,

WILSON MAKORI,

YOBENSIA BOSIBORI MAKORI,

GIDEON NYABUTO OGAO,

ALICE MORAA NYATARA,

CARO OKENYURI GIDEON,

EZEKIEL OMBASO OGAO,
JOHN WAMBUA MBUNGA,
MARY KANINI MUTUA,
ANTONY KIAMBUA,
SALOME MWITHI JOHN,
A.K., A MINOR BY NATURAL
GUARDIAN, MARY MUTUA,
PIUS MBUNGA MULI,
AGNES MUTHINI MBUNGA,
MARY MBATHA MBUNGA,
THOMAS MULI MBUNGA,
FRANCIS MAURU OSORO,
AIDA KERUBO MAURU,
JOYCE NYAMBEKI ORINA,
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PAULINE BOSIBORI OSORO,
MAURU MONENE CHUMA,
CALFRED MOSOMI FRANCIS,
ZAINABU BOSIBORI MAURU,
MARISELLA KEMUMA MAURU,
PERIS SERINA MAURU,
CLARE MOKEIRA ORINA,
LUCIA KERUBO OSORO,
RICHARD OBIRI OSORO,
PETER OGEKA OSORO,
CHARLES OGINGA OSORO,

SAMUEL OMBATI OSORO,

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OSORO,

ENOCK ONTITA,

GLADYS NYAMBEKI OTOKI,

ENOCK SONGORO,
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DORCAS NYANG'ARA,

RODAH NYASUGUTA ONTITA,

STANLEY OKEMWA ONTITA,

SARAH NYAMBOKE ONTITA,

STEPHEN ONTITA,

FRANCIS EMOMERI NYAKOL,

WILMINA NANJALA OBARA,

SHIRLEY ISEGERE,

CAMILLUS EMOMERI,

RAEL IKATUGURU,

FLEVIAH ITINOT,

LESTA OBARA,

OLIVER EKISA,

DEOGRATIAS ILUKOR EMOMERI,

CHARLES EMOMERI,

SIMON MULWA KIVELANGE,

STELLAH KAVINYA MULWA,

WANZA KIVELENGE,
DAVID KYALO,
DENNIS KIVELENGE MULWA,
GEORGE WAMBUA MULWA,
PETER KIVELENGE,
MARTHA KIVELENGE,
MALIA KIVELENGE,
MARY KIVELENGE,
MWANAYSHA NYAMGUNDA,
KHALFAN MOHAMED NGWEGWE,
KHALID MOHAMED NGWEGWE,
JARED OGWORA ABUGA,
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JANE ABUGA,
CONCEPTOR ABUGA,
JULIUS ABUGA,
ZACHARY NYAKUNDI,
JACKLINE MORAA,
JAMES NYAKUNDI,
MARY BOSIBORI NYAKUNDI,
JOB ONDIEKI ONDIBA,

KENNEDY OMARIBA NYAKUNDI,
NAFTALI MAROKO NYAKUNDI,
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OF JOHN MULELE,
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MICHAEL NAMIINDA WEKESA,
IRENE NASAMBU WEKESA,
JOINAH NASWA WEKESA,
DOREEN NANJALA WEKESA,
MERCY NALIAKA WEKESA,
ALI ADAN OSMAN,
DEHA AHAMED,
OSMAN ALI,
FATUMA ALI,
SAHARA OSMAN,
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GEORGIA MHOMA,
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MARY-NANCY K KALWIHURA,

STEPHEN JOSEPH KALWIHURA,

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RWECHUNGARA,

JOSEPH ALOO ODHIAMBO,

MARY ATIENO ALOO,

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JOEL ODUOL ODHIAMBO,

ERICK ODHIAMBO ALOO,

CHARLES OTIENO ALOO,

PAUL OTIENO,

ERICK ODHIAMBO ALOO,

ELIZABETH AKINYI,

JUDITH ACHIENG,

JOSEPHAT ATSUNGA,

NANCY MINAYO,

WILKISTER ACHAMI OCHARI,

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**JOSAPHAT ATSUNGA,
ADMINISTRATOR OF THE ESTATE
OF MAGARITA AUMA,**

FELIX EBURN OPONGO,

EDWARD NDALIRA ATSUNGA,

JOSEPH WAINAINA,

FAITH WANJIKU MUTHONI,

HANNAH NJERI KARIUKI,

RODNEY WAINAINA KARIUKI,

MARCUS MACHARIA KARIUKI,

MARTIN MWAURA KARIUKI,

MICHAEL MWINAMO,

**MICHAEL MWINAMO,
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**MICHAEL MWINAMO,
ADMINISTRATOR OF THE ESTATE
OF ROFAS KALAMA,**

JANE MMBONE,

CHRISTINE MMBONE MWINAMO,

JOSEPH NDUNGU OMBOGA,

LEAH WAMBOI,

BERNARD BOSIRE ASIRA,

LINET OPANGA,

BRYAN BOSIRE,

JOYCE BOSIRE,

IMMACULATE BOSIRE,

MICHELLE BOSIRE,

PETER ASIRA,

AGNES ASIRA,
STEM ASIRA,
NAOMI ASIRA,
LUCY ASIRA,
JOB ASIRA,
DANIEL ASIRA,
ZABLON LUSEGA,
HAWA NAMBOSO LUSEKA,
JENIPHER LUSEKA,
JANE KHAVAYI KEESILA,
CYNTHIA INZEI KEESILA,
ENOCK LUSEKA,
MANOAH LUSEKA,
DORAH LUSEKA,
HERBERT KAVOGI,
MOURINE KABEY MAKENZI,
HERBERT KAVOGI NYALESO,
ADMINISTRATOR OF THE ESTATE
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EPHALINA IDAYA,
VICTOR ANDOVE,
LAURA AVILIA,
VIOLA ILUSA,
STEPHEN PATRICK BUBERWA,
ISABELLA KOKURORA MUZANILA,
CHRISTOPHER MWOMBEKI,
BUBERWA,

**ELIZABETH KAGEMURO
BUBERWA,**

CHARLES NORBERT MUZANILA,

IMELDA MUZANILA TRAILL,

JOSEPH NORBERT MUZANILA,

OLIVER GODWIN KALEMANA,

**MEKITILIDA JOSEPHAT
KAMUTISHA,**

PHILBERT NORBERT MUZANILA,

BERNARDINA NJERU NORBERT,

GERALD RUTAINURWA MUZANILA,

PETER RWEYEMAMU MUZANILA,

NESTOR NORBERT MUZANILA,

MAGDALENA CYPRIAN GAYEYA,

CYNTHIA KIMBLE,

PATRICK KIMBLE,

PAUL KIMBLE SR.,

ARLENE KIMBLE,

TIMOTEO FLORES,

MARY LOU FLORES,

PAUL KIMBLE JR.,

PHILIP KIMBLE,

COLE KIMBLE,

CHAD KIMBLE,

ISHMAEL TIM FLORES,

BRIAN JOHNSON,

EDWARD DEAN STIVASON,

EDWARD HARRY STIVASON,
MICHAL-ANNE STIVASON,
TONYA MARCH,
TRACY ASHLEY,
JOSH STIVASON,
CODY MCCABE,
DEBBIE LAIRD,
JEREMIAH BOHN,
CHARLYNE LAVOIE,
TERRY STYF,
THERESA STYF,
CHARLES STYF,
AARON HATFIELD,
GEORGE HATFIELD,
JOANNE HATFIELD,
JOHN SCOTT DI CARLO,
MARY JO DI CARLO,
NICHOLAS RUSSELL DI CARLO,
SCOTT MATTHEW DI CARLO,
CHRISTOPHER MIKAEL DI CARLO,
GREG BOUDAH,
SHABAN ATHMAN ALLY,
MJENGI ALLY MALANGA,
SITA MAGHANGA MAGUA,
SITA MAGUA, ADMINISTRATOR OF
THE ESTATE OF GEORGE E.
BOLDARINI,

**SITA MAGUA, ADMINISTRATOR OF
THE ESTATE OF MUGHANGA
MAGUA,**

**SITA MAGUA , ADMINISTRATOR OF
THE ESTATE OF GILINTANDU
MAGUA,**

SULEMAN KETTY,

GILLDAN ELINA BOLDARINI,

GEORGE ELISHA BOLDARINI,

EVAN GEORGE BOLDARINI,

**SITA MAGUA, ADMINISTRATOR OF
THE ESTATE OF GINA EVELYN
BOLDARINI,**

**SITA MAGUA , ADMINISTRATOR OF
THE ESTATE OF GLENN EDWIN
BOLDARINI,**

TAUSI MAGHANGA MAGUA,

ZENA MUGHANGA MAGUA,

ERNEST BROWN MWENEWANDA,

**MONICA KAPILIMA,
ADMINISTRATOR OF THE ESTATE
OF HUGO KAPILIMA,**

NATALIA KAPILIMA,

JOHN MWENEWANDA,

YVONNE MWENEWANDA,

ROSALDINA MAKOYE,

GEORGE KAPILIMA,

ERHARD KAPILIMA,

NATALIUS KAPILIMA,

CUNBERT KAPILIMA,

LAURIAN KAPILIMA,

EPIFANIA KAPILIMA,
ANORLDA KAPILIMA,
RASHID ABDALLA KAZUMBA,
ABDALLA RASHID KAZUMBA,
ABDULRAHMAN ATHUMAN PEMBA,
SALAMA SALIM MBONDE,
REVENTINE REVERIANE BWOMA,
JANICE REVENTINE BWOMA,
ROGERS REVENTINE BWOMA,
VINCENT ALPHONCE NDOWO,
REHEMA YESAYA MWAKAHABALA,
DIANA VINCENT NDOWO,
PETER ANAEL TAIRO,
PRISCA CHARLES SCHONE,
EMMANUEL PETER TAIRO,
FRANCISCO PETER ANAEL,
SILLA PETER TAIRO,
MOHAMED IBRAHIM ADAM,
MWITA BERNARD SIMANGO,
RIAD KHALID HASSAN,
SAUDA DAUDA HASSAN,
TWAHA DAUDA HASSAN,
RICHARD WAMBURA FABIAN,
VIANNEY RUZANGWA,
GODELENE MUKAKINANI,
BRIANNA ILIZA,

BRUNEALLA ISHIMWE,
DEBORAH IKIREZI,
GORETTI KABATESI,
DIFDIANE KAYISANGWA,
CONCILIE BAKAYIRANGWA,
ROSE BAKAYISINOWA ,
MARY BONRG BUTARE,
SAMUEL KINUTHIA NJORGE,
MARGARET KIBUI KINUTHIA,
ALEX WAIHARO KINUTHIA,
ANTONY NJORGE KINUTHIA,
JAMES CHEGE KINUTHIA,
CAROLINE KABURA KINUTHIA,
JOSEPHINE GATHONI NJORGE,
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MABEL ULE TAKONA,
MARGARET N. TAKONA,
LAKOI M. TAKONA,
DIALE S. TAKONA,
MABEL J. TAKONA,
ELIZABETH W. MUCHANGI,
DANIEL O. TAKONA,
RUTH S. SOLITEI,
CHARLES J. SLATER,
ELIZABETH A. SLATER,
FORBES A. SLATER,

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LOUIS RATEMO,
FREDRICK RATEMO,
JOHN MAMBOLEO,
VERONICA MAMBOLEO,
JOHN MAMBOLEO,
REPRESENTATIVE OF THE ESTATE
OF MALCELAH MAMBOLEO,
BENAIYAH MAMBOLEO,
SALLY MASSY MAMBOLEO,
MARION MAMBOLEO,
CRESENCIA MAMBOLEO,
FLORENCE MAMBOLEO,
ANTHONY MAMBOLEO,
THIOPHINE MAMBOLEO,
FESTUS OMINDE,
REPRESENTATIVE OF THE ESTATE
OF EMELDAH OMINDE,
DAN OMINDE,
FRED OMINDE,
JUSTIS NJUGURA,
WILLIAM MWONGE,
JOHNSON MWONGE,
FRANCIS NJORGE ,
REPRESENTATIVE OF THE ESTATE
OF FRANCIS NGIGI,
SALAMONE GIKONYO WIFE,
REPRESENTATIVE OF THE ESTATE
OF ONESMUS MITAMBO,
SIMON NGUGI,

JOHN NYORO NYOIKE,
NANCY NJERI BERNARD,
FLORENCE WAMBUI KAIRU,
ELIZABETH MUTHONI MBUGUA,
PERIS WANJIRU KANYIRI,
REPRESENTATIVE OF THE ESTATE
OF EDWIN K NYOIKE,
VERONICA NYOIKE,
REPRESENTATIVE OF THE ESTATE
OF ESTHER NDUTA,
JULIUS OKEW OGOLLA,
CHRISTINE ATIENO OMOLLO,
JUDITH OPONDI ONYANGO,
GEORGE OGOLLA,
REPRESENTATIVE OF THE ESTATE
OF JAMES AWGREY OGOLLA,
MARY OFISI, REPRESENTATIVE OF
THE ESTATE OF YOHANA
WABWOBA MALEWA,
VICTORIA NEKESA WABWOBA,
PETER MUNGU OFISI,
MARY OFISI, REPRESENTATIVE OF
THE ESTATE OF CHARLES MALOBA
MAKAU OFISI,
MARY OFISI, REPRESENTATIVE OF
THE ESTATE OF DANIEL MAKAU
OFISI,
AUGUSTINE WANYONYI
WABWOBA,
MATHIAS SIFUNA WABWOBA,
CHRISTOPHER NYONGESA
WABWOBA,
ISAAC JUMA WABWOBA,

CECILIA WABWOBA KONDOA,
CATHERINE N. WABWOBA,
CLAIRE N. WABWOBA,
ADELAIDE N. WABWOBA,
SAMUEL ORIARO,
REPRESENTATIVE OF THE ESTATE
OF BETTY OBUNGA ORIARO,
JOSEPH OBUDHO,
MARGARET ACHIENG OBUDHO,
JEFF RABAR ODHIAMBO,
JEDIDAH AKOTH,
HESBON ONYANGO,
RACHEL AWINO,
BEN ONYANGO,
LOREEN AOKO,
KENNEDY OUMA ORIARO,
DINA KAVAI MADAHANA,
CHELSEA RUTH BUSERA,
HUSSEIN SHARIFF ALI,
MWANAIDI MUTHONI ALI,
AGNES NYAGOGHA ATINGA,
VINCENT OMWALIKI,
CHRIS OPATI JOSEPHINE
ANTING'A,
JANE IMINZA ATINGA,
MARGARET AFANDI,
LORNAH SIAGO,
RUTH DORIS,

MARY ATAYI ANDEKA,
AGNES ISOI JAIRUS,
CAROLINE ONDISO JAIRUS,
EZEKIEL AURA JAIRUS,
MIKE MDEKA JAIRUS,
CARLOS AMUKONYI JAIRUS,
HENRY KESSY, REPRESENTATIVE
OF THE ESTATE OF BALTAZAR
NDEURAMBARI KESSY,
ELIZABETH DAUDI NGOWO,
NGIGI JAMES MUGO,
GRACE WARIARA MUGO,
DANSON CHUGI MUGO,
GEORGE KANYIRI MUGO,
MOSES NJOROGI MUGO,
RACHEL WAMBIYE WATORO,
MALICAH MAMBELEO,
EMELDAH B STRICKLEN,
FR. JOHN KIONGO KARIUKI,
TERESIA WAIRIMU KARIUKI,
PIUS KIONGO,
LINUS KAMAU,
BONOFACE MWAURA,
ATTANAS MUTYSA NZOMO,
THOMAS KIVINDYO NZOMO,
ALEXANDER MBITHI NZOMO,
CECILIA MBUU NZOMO,

JOSEPH MUINDE NZOMO,
LAWRENCE MUSEMBI NZOMO,
CHRISTOPHER KYALO MULWA,
FREDRICK WAMBUA MULWA,
COLLINS MUTINDA MULWA,
KOUYCE WANGECI MULWA,
VIRGINIA WANZAU MULWA,
CAROL MBATHA MULWA,
NOMANYI OKORO OGORO
GETONTO MONDA,
NOMANYI OKORO,
REPRESENTATIVE OF THE ESTATE
OF BATSHEBA MATURU OGORO,
JAMES OGWERI GWARO,
MARGARET OBUTU OGORO,
NOMANYI OKORO,
JOSEPH OGORO GETONTO,
TRUBOSA MORAA CHRISTOPHER,
PRISIKILA KWAMBOKA MINGATE,
ZIBIA NYABOKE BENSON MUSA,
JOYCE BARONGO OGORO,
ALICE NYAKERARIO OGORO,
NORAH KERUBO OGORO,
MILKA NYANCHAMA,
RUSHIL PATEL,
KANISHA PATEL,
TRUPTI GORAJIA,
NIRAJ AMIN,

**CATHERINE MUREITHI,
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OF ZIPPORAH WAHOME,**

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CHARITY M. GICHUKI,

ESTHER W. WAHOME,

CHARLES KIBIRA WAHOME,

JACKSON M. WAHOME,

MERCY WANJIRA,

ALEX M. WAHOME,

ANN MUTHONI NGUGI,

JORAM KAGIMBI KIARIE,

PAUL MURITHI NKANATHA,

MARGARET KAJUJU KINOTI,

ISSABELA NDURU MBURUGU,

MONICAH KATHURE KIMAITA,

GLADYS KINANU SILAS,

SARAH WORU MBAYA,

HENRY KAARIA NKANATHA,

PURITY KARIMI KANJI,

BOAZ OLANDO,

ELIJAH MACHARIA RITHO,

**ELIJAH MACARIA,
REPRESENTATIVE OF THE ESTATE
OF SUSAN MACHARIA,**

AMANDA NEREA AYEMBA OLAO,

IRENE IVY WAKARIMA MACHARIA,

PAULINE NJERI MACHARIA,

WINFRED MUTHONI MWENDWA,
ELIZABETH WAHITO MURIUKI,
SIMON NGURE, REPRESENTATIVE
OF THE ESTATE OF JOHN NGURE
GAKONYO,
JACKSON NGURE,
REPRESENTATIVE OF THE ESTATE
OF PENINAH NJERI NGURE,
ROMANUS MURIUKI MWANGI,
JACKLINE WAMBUI,
LYDIA WANJA,
JOHN NYORO NGURE JOSEPH
NYORE NGURE,
JACKSON NDUNGU NGURE,
DAMARIS WAIRIMU,
FRANCIS GITAU NGURE,
ANTHONY WAMBUI,
REPRESENTATIVE OF THE ESTATE
OF MARGARET WAMBUI NGURE,
STEPHEN NJUGUNA,
BRIAN NGURE WANJIKU,
REPRESENTATIVE OF THE ESTATE
OF HANNAH WANJIKU NGURE,
SIMON WANGI NGURE,
REPRESENTATIVE OF THE ESTATE
OF DANIEL MUNGAI NGURE,
JANE WANJIRU NGURE,
TIBRUSS MINJA, SR.,
GLORIA T. MINJA,
MAGRET ATIENO OGALO,
MARGRET AUMA WAGEYA,
JULIANA AUMA,

STEPHEN OYAGAH OPONDO,
LECTINE OYAGAH OPONDO,
EDWARD OGUTU OLOKA,
YOANINA ACHOLA OPONDO,
JOSEPHINE ANYANGO LWANDEH,
BRENDA AKINYI OPONDO,
JUDITH AKUKU OPONDO,
PAULINE ADHIAMBO,
IRENE NAMUDE,
SUSAN WANJERI MWAE,
JANET MUKAMI MWAE,
TITUS MUSYOKA JANE KOLA
MWITINGI,
JOHN NJUGUNA NGANGA,
LUCY MUTHONI NJUGUNA,
PETER NGANGA NJUGUNA,
ALBERT NDERU NJUGUNA,
PENINAH WANJIKU GACHECHE,
CAROLINE GATHONI,
FREDRICK MBURU NJUGUNA,
JUNE SHEILA ADHIAMBO OKECH,
RICHARD CLAUDIO ATIENO
OCHIENG,
ROBERT OKECH,
JOYCE MILLICENT ADHIAMBO
ONYANGO,
MERCY EMMA ADHIAMBO ALUDO,
JANE ACHIENG ONYANGO,

**CAROLINE OKECH,
REPRESENTATIVE OF THE ESTATE
OF JAMES AGGREY ONYANGO
ATIENO,**

JUDY WAHOME KAMAU,

SUSAN WAHOME,

ANTHONY JOSEPHAT MWANGI,

BEATRICE WANGECHI,

FRANCIS M. MACHARIA,

EVELYN MACHARIA,

GRACE WANGUI MUTHIGANI,

RICCARDA W. KIRIMGI,

EUNICE WANJIKU KARANJA,

MAUREEN MUGURE KARANJA,

DENIS NDUTI KARANJA,

ZAHABIYA MALIK,

AHSANHUSEIN S MALIK,

DORCAS KHAVERE SAKWA,

ALVIS ASUNYA NZALWA,

RACHAEL GATHONI KIBIRO,

ALEXANDER GATHONI KIBIRO,

PETER GATHONI KIBIRO,

ELIZABETH WANGARI NJOGU,

DANIEL MWANGI KAMAU,

JAMES WACHIRA KAMAU,

HANNAH WANJIRA KAMAU,

MAUREEN WANGU KAMAU,

SUSAN WANGECI MUNYORI,

**MILKAH WAIRIMU MAINA,
JOEL BUKU MUNYORI,
JOHN MAGU MUNYORI,
GRACE WANJIRU MUNYORI,
ROSE ARAKA,
DIANA ALICE OCHOLA,
KENNEDI UHURU OMORI,
HUSSEIN MAHUNDI,
HARUN MAHUNDI,
MUSSA MAHUNDI,
SHIDA MAHUNDI,
MARIAM MAHUNDI,
ZUHURA MAHUNDI,
RUKIA MAHUNDI,
WILLIE CHANGE,
AGNES WAIRIMU MAHEHU,
NICHOLAS MAGAK,
KELVIN AGER,
NATHANAEL BABIRA,
JEMIMA NDEDA,
ROSE AMBANI,
JACKSON NDEDA,
NICHOLAS NDEDA,
JOHN NDEDA,
PATRICK OKECH,
REPRESENTATIVE OF THE ESTATE
OF JANE OLUNGA OKECH,**

**FREDRICK HORRACE OCHIENG
OUMA,**

LILLIAN ISABEL ATIENO OUMA,

**GEORGE EMMANUEL OKOTH
OUMA,**

JOHN MARK OLUOCH OKECH,

**JOSHUA WALTER OMONDI
OKETCH,**

RISPAR LUCY AWUOR,

TRACY JANDY,

FRED JANDY,

RACHEL JANDY,

MARGARET HOPE JANDY,

**MARGARET HOPE JANDY,
REPRESENTATIVE OF THE ESTATE
OF BEATRICE JANDY,**

STELLA KEMUNTO KEBUNGO,

JENNIFER MORAA KEBUNGO,

CHARITY KERUBO KEBUNGO,

EMILY BONARERI KEBUNGO,

MERCY KWAMBOKA KEBUNGO,

SHEILA NYANCHOKA KEBUNGO,

DENNIS KINYUA MAGOTHE,

EDWIN KAARA MAGOTHE,

CECILIA MIJUKA,

CHRISTINE ANDISI MIJUKA,

ERIC OMONDI ADIKA,

FIONA ADHIAMBO ADIKA,

CHRISTINE EVET ANYANGO ADIKA,

BERAL ATIENO SHAKESPEAR,
WINFRED WAMBUI MICHOBO,
CATHERINE MUGURE MICHOBO,
STEPHEN GICHURU,
AMOS KINUTHIA,
JAMES KABUU NGUGI,
MARY MMBONE,
ANN KIAZA MASAMBAGA,
CAROLINE ANDISI MAYUNZU,
HILLARY MAYUNZU,
FREDRICK NYAMU,
REPRESENTATIVE OF THE ESTATE
OF M'IKIARA M'IKIUGU,
FREDRICK NYAMU,
REPRESENTATIVE OF THE ESTATE
OF JOYCE KARUKU M'IKIARA,
JANET KAGWIRIA IKIARA,
MONICA KARIMI IKIARA,
ISAACK MUTHOMI IKIARA,
FREDRICK NYAMU IKIARA,
JOHN KITHINJI IKIARA,
FREDRICK NYAMU,
REPRESENTATIVE OF THE ESTATE
OF ROBERT GITHONGA IKIARA,
FREDRICK NYAMU,
REPRESENTATIVE OF THE ESTATE
OF JOHN MWITA IKIARA,
VANICE ONSONGO,
WALSH K. IRUNGU,
BOB M. IRUNGU,

IAN C. IRUNGU,
JENNIFER ANDATI ANDIIKA,
JARED OTIATO ANDIIKA,
JOAN NYASIRI ANDIIKA,
MICHAEL INDIMULI ANDIIKA,
EGLAI JUDITH ANDIIKA,
LINET ANDIKA,
HUMPHREY ONG'ALE ANDIIKA,
LAWRENCE ESHIWANI ANDIIKA,
FEBEH MINAYO AZIAVULA,
LEVI AMWAI LUMUMBA,
BETTY ENGESIA SALAMBA,
VIOLET KADENYI SALAMBA,
NANCY AFANDI SALAMBA,
JARIAH OKINDO,
CHARLES MINARO OTAO,
EDNAH NYANCHAMA OTAO,
VICTOR AUMA OTAO,
MALACHI OKINDO OTAO,
ASIKA OKINDO,
DORCAS OKINDO,
ZIPPORAH OKINDO,
NAOMI OKINDO,
DANIEL OKINDO,
ISAAC OKINDO,
DAMARIS OKINDO,

JOSEPHINE OKINDO,
NORAH OKINDO,
HARON OKINDO,
VALENTINA HIZA,
CHRISTERMARY HIZA,
CHRISANTSON HIZA,
CHRISTOPHER HIZA NYANGE,
CHRISPERCY HIZA,
PHILEX HIZA,
CHRISPIN HIZZA,
CHRISOOGON MNDOLWA HIZA,
MAUTI YESWA KHASANDI,
ISAIAH MAIVEN KHABUCHI,
COLLINS MUSALA,
REPRESENTATIVE OF THE ESTATE
OF PETER ATING'A MILIMU,
AGNES NYAGOGHA ATING'A,
COLLINS ATINGA MUSALIA,
WILLINGTON MUDAKI,
PETER MAKENZI,
MARGRET AFANDI ATING'A,
RUTH DOIS AVISA,
JANE IMINZA,
LONAH SIAGO PETER,
ANITA N KIBUE,
ANGELA S KIBUE,
LUCY N KIBUE,

JUNE W KIBUE,
CAROLINE M MULI,
VERONICA N MULI,
DOROTHY M MULI,
CHARLES M MULI,
AGNES I MULI,
CATHERINE KI MULI,
SOLOMON MBURU NGANGA,
ELIZABETH WANJIRU MBURU,
JOYCE WANGARI MBURU,
DAVID NGANGA MBURU,
LUCY GATHONI MBURU,
NANCY WAITHERA MBURU,
ROSALID WAITHERA MBURU,
WINROSE WANJIRU KIRIMA,
JANE NYOKABI KIRIMA,
JOHN MWANGI KIRIMA,
MARY NJOKI NJENGA,
NICHOLAS KARANJA NJENGA,
ALICE WANINI NJENGA,
JAMES KUNGU NJENGA,
PATRICK KINYANJUI NJENGA,
SHADRACK OTIENO OLOO,
REPRESENTATIVE OF THE ESTATE
OF CHRISTINE AWUOR OLOO,
JECKTONE OWITI OLOO,
CAROLINE A OLOO,

SHADRACK OTIENO OLOO,
SIMON OBALA OLOO,
ENOCK OUMA OLOO,
SHARON D OLOO,
LEAH AKINYI OLOO,
JANE RACHAEL OLOO,
SOLOMON OBIERO OLOO,
KENEDY OKELO, REPRESENTATIVE
OF THE ESTATE OF WILLIAM
METHO OKELO,
KENEDY OKELO, REPRESENTATIVE
OF THE ESTATE OF RISPAH
DOROTHY OUMA OKELO,
ELIZABETH A OKELLO,
HELLEN OLUOKO OKELLO,
KENNEDY O OKELO,
RONALD O OKELO,
NELSON ODEMO KORONGO,
MARY IMALI KORONGO,
GRACE MBAIZA KORONGO,
BENSON LUGWIRI KORONGO,
AGGREY MADAYIA KORONGO,
MARGARET ALEYO KORONGO,
WYCLIFFE ANGAYA KORONGO,
NANCY KANAITSA KORONGO,
ALLAN VURURE KORONGO,
ALEX MBOSHA KORONGO,
PAUL VRONTAMITIS,

**NICHOLAS LEONIDAS
VRONTAMITIS,**

**ANASTASIA GIANOPULOS
ALEXANDRA VAPORIDIS,**

**TESSY VAPORIDIS ATHANASIOS
VAPORIDIS,**

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ERIC KINYOWE MULI,

JANE NDUKU MUTUA,

MARGARET MUTUA,

VICTOR MUTUA,

REGINAH B. ALANDO OWITI,

DOLPHINE ACHIENG OWITI,

PATRICIA ATIENO OWITI,

MAURICE OMONDI OWITI,

LEONARD BONIFACE OMONDI,

ROSE OLDO,

PHOEBE NDEGWA,

NAFTALY NDEGWA,

ERUSTUS NDEGWA,

MERCY NDEGWA,

JANE NDEGWA,

SAMUEL NDEGWA,

PATRICK NDEGWA,

CHARLES NDEGWA,

GRACE NDEGWA,

LEAH NDEGWA,

PHILIP OYOO,

EVELYN OYOO,

JOSHUA OYOO,

**EDWIN OYOO, REPRESENTATIVE
OF THE ESTATE OF CRISTABLE
OYOO,**

PHOEBE SEWE ODHIAMBO,

JANE RODAH ONYONYO,

EMILY MARY OPONDO,

MESHACK OWUOR OLANDO,

GORDON NG'WONO OLANDO,

ELIZABETH KIBODYA,

EMMANUEL KIBODYA,

MARGRETH KIBODYA MBWANA,

MARY KIBODYA MHAYAYA,

CLARA GEORGE KIBODYA,

EVA GEORGE KIBODYA,

FELIX GEORGE KIBODYA,

PETER NDUATI MBARI,

MERCY WANJIKU NDUATI,

MARY MUTHONI NDUATI,

MOSES MUIRURI NDUATI,

NAOMI WAKANYI NDUATI,

PERIS NDUATI,

MERCY WANJIKU MDUATI NDUATI,

ASHA OMARI ABDULLAH,

MOHAMED SELEMANI KATIMBA,

SAID SELEMANI KATIMBA,

SIJALI SELEMANI,
CATHERINE NDUMI NYETTE,
NICHOLAS KATUA NYETTE,
EDWARD MUA NYETTE,
CHARLES KIMWELI NYETTE,
DOROTHY NDUNGE GICHURU,
ALEXANDER KARUGI GICHURU,
CHARLES MUGANE GICHURU,
ALICE NJERI GACHAU,
JOHN BAPTISTA KABUI,
REPRESENTATIVE OF THE ESTATE
OF BERNARD KABUI GITHIOMI,
LUCIA WANGUI KABUI,
LUCY WANGUI GACHAU,
STELA MUTHONI GACHAU,
EUNICE MWANGI,
ANTHONY MWANGI KABUI,
JANE WANJIRU NDEI,
JOHNBAPTISTA NDIBUI KABUI,
BONIFACE KAROBIA KABUI,
JULIA JEROP KIGENO,
MOSES OMWENGA,
FAITH JEROTICH BARMOBEN,
CHARLES MARITA NYAMWENO,
ELIZABETH JENNIFER WAYUA
MARITA,
PETER OYUGI NYAMWENO,

**MARGARET NYABOKE
NYAMWENO,**

ANNA KWAMBOKA KENYORU,

BISIKIRA MORAA MAINA,

SUSAN KERUBO OMAO,

LUCY NJERI GICHUHI,

JOSEPH NDIRANGU NGUGI,

MARGARET WERE MUSHIBE,

ALBERT ASINGO ODERO,

ARNOLD ODERO ODUKENYA,

NAHASHON GATHUNGA KIMANI,

HANNAH NYAWIRA KIMANI,

MARGARET WAKINI KIMANI,

MILIKAH WANJIRU KIMANI,

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JUSTUS MUSYOKA WILLY,

MAURICE KIOKO WILLY,

JOHNSTONE MUTHAMA WILLY,

BENJAMINE MUTUNGA MULWA,

ANTHONY KYALO WILLY,

REGINA KITHEI MANENO,

FAITH MBITHE WILLY,

SHERYL LYNEMERSON,

LOUISE DARLENE RICHARDS,

DANSTONE OCHOLA,
CHARLES OCHOLA,
WILSON OBTABILA OCHOLA,
PERIS KHAYELI OCHOLA,
ROSELYNE INDEKHWA OCHOLA,
REBECCA ODHIAMBO,
ALICE AKINYI ODHIAMBO,
CHRISTINE JUMA ODHIAMBO,
MARGARET VALERIE ODHIAMBO,
METRINE NALISI KUBAI,
PAMVILLIAN NALISI KUBAI,
SHALINE NALISI KUBAI,
CONNIE CHEPKOECH MARITIM,
ANGELA CHERUTO MARITIM,
CAROLINE CHEBICHII,
DIANA CHEPTARUS,
NAUM JEPCHIRCHIR SUGUT,
MARGRET JEPKORIR,
LENA JELAGAT,
EVERLYN JEBICHI MAYIO,
TRUFOSA JEPLETING RUTO,
ALEX NGUNYANGI KARIITHI,
MAXWELL KARIITHI,
MARY WACHIRA,
JOB KARIITHI,
PETER KAREITHI,

TABITHA GACHIENGU,
NIXON KARIITHI,
SAMUEL KAREITHI,
NEWTON KIBIRU WAMBUGU,
TIFFANY WANJIRU WAMBUGU,
MWANGI WAMBUGU KIBIRU,
SYLVIA WANGUI WAMBUGU,
TOM CHOGO,
JOICE KALIMA NTHAKU,
IRENE MARGARET NZAKU,
ALPHA WAMBUA NTHAKU,
FORTUNATUS KYALO NTHAKU,
ANGELINE MUTHOKI NZAKU,
MARY NZAKU,
LILIAN MUKAI NZAKU,
WILLIAM NZAKU,
DEDMOND NZINGA NZAKU,
BORIS MAKAU NZAKU,
KHADIJAH NJERI KAKA IDDI,
ZUHURA IKI IDDI,
ABUBAKAR MWANGI IDDI,
ZENA MASITSA KARANI,
JOSEPHINE ACHITSA,
LOUIS TENDWAH,
VIOLET AKWENDA,
MUFOYONGO,

**JOSEPHINE ACHISTA,
REPRESENTATIVE OF THE ESTATE
OF ANTONY SHITAKHA
MUFOYONGO,**

**JOSEPHINE ACHISTA,
REPRESENTATIVE OF THE ESTATE
OF EDWIN SHITANDAYI
MUFOYONGO,**

VICTORIA WASAMBA NYAGILO,

ASHLEY ANYANGO ODHIAMBO,

MARYANNE AGOLA MUTHUURI,

REGINA WANGU,

ANNE NYOKABI MACHARIA,

EMILY WAIRIMU WAITHAKA,

WANGECHI WAITHAKA,

IRENE MUTHONI WAITHAKA,

ELIZABETH WAITHAKA,

RAYMOND FERNANDES,

MICHAEL NKANJA,

CHARITY KIATO,

MARY ESTHER KIUSA,

FATUMA IDI OMAR,

JOHNSTONE MUKABI,

JUSTIN AMDUSO,

TANYA NAIR,

JOHN ZEPHANIA,

MERCY MAKUNGU,

DENIS MATEM MPOTO,

**LUCY MUTHONI GITAU, ON
BEHALF OF LAWRENCE AMBROSE
GITAU, DECEASED,**

LUCY GITAU,

CATHERINE GITAU,

ERNEST GITAU,

FELISTER GITAU,

MARGARET GITAU,

SUSAN GITAU,

**HANNAH NG'ENDO KAMAU, ON
BEHALF OF VINCENT KAMAU
NYOIKE, DECEASED,**

HANNAH NGENDA KAMAU,

ANTHONY NJOROGI,

SIMON NGUGI,

CAROLINE WANJURI KAMAU,

CHRISTINE MIKALI KAMAU,

DUNCAN NYOIKE KAMAU,

**JOSINDA KATUMBA KAMAU, ON
BEHALF OF FAITH WANZA KAMAU,
DECEASED,**

**HANNAH NG'ENDO KAMAU, ON
BEHALF OF JENNIFER NJERI,
DECEASED,**

JOSINDA KATUMBA KAMAU,

MERCY WANJIRU,

RUTH NDUTA KAMAU,

STANLEY NYOIKE,

**STANLEY NYOIKE NJOROGI, ON
BEHALF OF WALLACE NJOREGE
NYOIKE, DECEASED,**

**PRISCILA NDULO OKATCH, ON
BEHALF OF MAURICE OKATCH
OGOLLA, DECEASED,**

PRISCILA OKATCH,

DENNIS OKATCH,

JACKLINE ACHIENG,

ROSEMARY ANYANGO OKATCH,

SAMSON OGOLLA OKATCH,

**MARY MUTHEU NDAMBUKI, ON
BEHALF OF KIMEU NZIOKA
NGANGA, DECEASED,**

MARY NDAMBUKI,

LUKAS KIMEU,

MICHAEL KIMEU,

WINNIE KIMEU,

ELIZABETH KIATO,

CHARITY KIATO,

STANLEY KINYUA MACHARIA,

**STANLEY MACHARIA KINYUA, ON
BEHALF OF NANCY MACHARIA,
DECEASED,**

RAPHAEL PETER MUNGUTI,

MARY MUNGUTI,

FELIX MUNGUTI,

PETRONILA MUNGUTI,

ALEX MUNGUTI,

MARY OFISI,

JOHN OFISI,

GIDEON OFISI,

ANDREW OFISI,
FRANCIS OFISI,
SAMUEL ODHIAMBO ORIARO,
BETTY ORIARO,
LIVINGSTONE BUSERA
MADAHANA,
JUDITH NANDI BUSERA,
LEVIS MADAHANA BUSERA,
EMMANUEL MUSAMBAYI BUSERA,
CHRISTINE KAVAI BUSERA,
BONIFACE CHEGE,
LUCY CHEGE,
FRIDA YOHAN MTITU,
GEOFFREY TUPPER,
SHADRACK TUPPER,
AGNES SENG GAOFFREY TUPPER,
GAUDENS THOMAS KUNAMBI,
JOYCE THADEI LOKOA,
SELINA GAUDENS,
DONNIE GAUDENS,
HOSIANA MBAGA,
MARY ESTHER KIUSA,
MARGARET WAITHIRA NDUNGU,
JEFF RABAR,
LEONARD RAJAB WAITHIRA,
JOSEPH NDUNGU WAITHIRA,
GRACE WANJIRU WAITHIRA,

RUKIA WANJIRU ALI,
BADAWY ITATI ALI,
AUGUST MAFFRY,
CAROLINE MAFFRY,
ALISON MAFFRY,
ALICE MARY TALBOT,
BEATRICE ATINGA,
SAMMY OKERE,
PURITY MAHONJA,
VICTOR ADEKA,
BERNARD MUTUNGA KASWII,
JAIRUS DAVID AURA,
HENRY BATHAZAR KESSY,
PETER NGIGI MUGO,
GRACE NJERI KIMATA, ON BEHALF
OF FRANCIS WATORO MAINA,
DECEASED,
RACHEL WAMBUI WATORO,
GRACE KIMATA,
VICTOR WATORO,
VELMA AKOSA BONYO, ON BEHALF
OF WYCLIFFE OCHIENG BONYO,
DECEASED,
VELMA BONYO,
ANGELA BONYO,
DORINE BONYO,
ELIJAH BONYO OCHIENG,
WINNIE BONYO,

**SALLY KWAMBOKA RATEMO, ON
BEHALF OF SALLY CECILIA
MAMBOLEO, DECEASED,**

LUIS RATEMO,

FREDERICK RATEMO,

KEVIN RATEMO,

SALOME RATEMO,

**CATHERINE WAITHIRA GITUMBU,
ON BEHALF OF JOEL GITUMBU
KAMAU, DECEASED,**

CATHERINE GITUMBU KAMAU,

DAVID KAMAU,

**CATHERINE WAITHIRA GITUMBU,
ON BEHALF OF PERIS GITUMBU,
DECEASED,**

STACY WAITHERE,

PETER KAMAU,

PHILLIP KAMAU,

**JANE NDUTA KAMAU , ON BEHALF
OF JOSEPH KAMAU KIONGO,
DECEASED,**

**NEWTON AMBROSE NGANGA
KAMAU, ON BEHALF OF LUCY
KIONGO, DECEASED,**

TERESIA WAIRIMU KAMAU,

PAULINE KAMAU,

PETER KAMAU KIONGO,

NEWTON KAMAU,

ALICE KIONGO,

HANNAH WAMBUI,

DANIEL KIONGO KAMAU,

**ALICE MUTHONI KAMAU KIONGO,
ON BEHALF OF MERCY WAIRUMU
KAMAU, DECEASED,**

PAULINE KAMAU KIONGO,

JANE KAMAU,

JOAN KAMAU,

MONICAH KAMAU,

RAPHAEL KIVINDYO,

MARGARET NZOMO,

NICHOLAS MUTISO,

ANGELA MWONGELI MUTISO,

CHARLES MWANGI NDIBUI,

GEORGE MWANGI,

JOHN NDIBUI,

MARGARET MWANGI NDIBUI,

JULIUS OGORO,

EUCABETH GWARO,

JAMES GWARO,

LYDIA GWARO,

DEBORA GWARO,

EMMANUEL GWARO,

TRUSHA PATEL,

PANKAJ PATEL,

BETTY KAGAI,

ELSIE KAGIMBI,

NORMAN KAGAI,

TABITHA KAGAI,

**FREDRIKA KAGAI, ON BEHALF OF
CHARLES KAGAI, DECEASED,**

WENDY KAGAI,

CHARLES MWIRIGI NKANATHA,

FRIDAH MAKENA,

RUTH GATWIRI MWIRIGI,

JOAN KENDI NKANATHA,

EVITTA FRANCIS KWIMBERE,

FRANCIS KWIMBERE,

IRENE KWIMBERE,

FREDERICK KWIMBERE,

SANI KWIMBERE,

MILKA WANGARI MACHARIA,

BARBARA OLAO,

ALLAN OLAO,

SIMON NGURE,

JACKLINE WAMBUI,

CATHERINE NJERI MWANGI,

JACKSON NDUNGU,

JOHN NGURE,

**SIMON MWANGI NGURE, ON
BEHALF OF JOSEPH KAMBO,
DECEASED,**

LUCY KAMBO,

TIBRUSS MINJA,

LEVINA MINJA,

VIOLET MINJA,

EMMANUEL MINJA,

NICKSON MINJA,

HILARIO AMBROSE FERNANDES,

**THE ESTATE OF CATHERINE
MWANGI**

**LECTINE OYANGA OPONDO , ON
BEHALF OF CHARLES OPONDO,
DECEASED,**

EDWARD MWAE MUTHAMA,

**MARY MUTHONI NDUNGU , ON
BEHALF OF FRANCIS NDUNGU
MBUGUA, DECEASED,**

MARY MUTHONI NDUNGU,

ANNASTACIAH LUCY BOULDEN,

AGNES WANJIKU NDUNGU,

EDITH NJERI,

JAMLECK GITAU NDUNGU,

JOHN MUIRU NDUNGU,

SAMUEL MBUGUA NDUNGU,

**MONICAH OKOBA OPATI , ON
BEHALF OF RAELE OPATI,
DECEASED,**

CAROLINE OPATI,

MONICAH OPATI,

**MONICAH OKOBA OPATI , ON
BEHALF OF SELIFAH OPATI,
DECEASED,**

**BEATRICE MARTHA KITHUVA, ON
BEHALF OF DOMINIC MUSYOKA
KITHUVA, DECEASED,**

KAMALI MUSYOKA KITHUVA,

TITUS KYALO MUSYOKA,

BEATRICE MARTHA KITHUVA,

MANZI MUSYOKA,
BENSON MALUSI MUSYOKA,
GLADYS MUNANI MUSYOKA,
JACKSON KITHUVA MUSYOKA,
KEELIY MUSYOKA,
SYUINDO MUSYOKA,
JANE MUTUA,
MARY NZISIVA SAMUEL,
BEATRICE MARTHA KITHUVA
(MUSYOKA), ON BEHALF OF
CAROLINE KASUNGO MGALI,
DECEASED,
OMAR ZUBERI OMARI, ON BEHALF
OF MOHAMED ABDALLAH
MNYOLYA, DECEASED,
NURI HAMISI SULTANI,
OMAR ZUBARI OMAR,
ELIYA ELISHA PAUL,
GRACE MAKASI PAUL,
MARY MERESIANA PAUL,
MAHAMUD OMARI IDI, ON BEHALF
OF HINDU OMARI IDI, DECEASED,
FATUMA OMAR,
ALI HUSSEIN ALI,
HAMIDA IDI,
MAHAMUD OMARI IDI,
MAHAMUD OMARI IDI, ON BEHALF
OF OMAR IDI, DECEASED,
RASHID OMAR IDI,
STELLA MBUGUA,

SOLOMON MBUGUA,

JEFFREY MBUGUA,

ALEX MBUGUA,

**LUCY NGINA NG'ANG'A, ON
BEHALF OF SAMMY MWANGI,
DECEASED,**

LUCY MWANGI,

ANNE NGANGA MWANGI,

ESTER NGANGA MWANGI,

CAROLINE OKECH,

**CAROLINE OKECH, ON BEHALF OF
JANATHAN OKECH, DECEASED,**

JACINTA WAHOME,

JOSEPH WAHOME,

**MARY AKOTH OGANGA(MARY
AKOTSI MUDECHE) , ON BEHALF
OF WELLINGTON OLUOMA,
DECEASED,**

MARY MUDECHE,

MICHAEL WARE,

MARY MUIRIRI,

JONATHAN NDUTI,

NAFISA MALIK,

REHANA MALIK,

JAPETH GODIA,

**JAPETH MUNJAL GODIA, ON
BEHALF OF MERAB GODIA,
DECEASED,**

HENRY ALIVIZA SHITIAVAI,

JUDY ALIVIZA,

HUMPHREY ALIVIZA,

COLLINS ALIVIZA,

JACQUELINE ALIVIZA,

**ALVIS ASUNYA NZALWA, ON
BEHALF OF ENOS NZALWA,
DECEASED,**

JOSEPH GATHUNGA,

MICHAEL MWANGI,

MONICA WANGARI MUNYORI,

CHARLES MUNGOMA OLAMBO,

SAJJAD GULAMAJI,

**JANE KAVINDU KATHUKA (JANE
KARINDU MULU), ON BEHALF OF
GEOFFREY KALIO, DECEASED,**

JANE KATHUKA,

AQUILAS KALIO,

**PAUL NZOKA NDETI, ON BEHALF
OF BERNICE NDETI, DECEASED,**

CATHERINE KALIO,

DAWN MULU,

LILIAN KALIO,

TABITHA KALIO,

**FLORENCE PAMELA OMORI, ON
BEHALF OF EDWIN OMORI,
DECEASED,**

FLORENCE OMORI,

BRYAN OMORI,

JERRY OMORI,

**AISHA KAMBENGA MUSSA, ON
BEHALF OF BAKARI NYUMBU,
DECEASED,**

AISHA KAMBENGA,
ENNA OMOLO,
HUSSEIN RAMADHANI MAHUNDI,
ON BEHALF OF RAMADHANI
MAHUNDI, DECEASED,
HUSSEIN RAMADHANI,
ALLY MAHUNDI,
AMIRI MAHUNDI,
ASHA MAHUNDI,
ASHA KILUWA,
EMMA MAHUNDI,
JUMA MAHUNDI,
MWAJABU MAHUNDI,
MWAJUMBA MAHUNDI,
SAID MAHUNDI,
SHABAN MAHUNDI,
YUSUPH MAHUNDI,
WINFRED WAIRIMU WAMAI, ON
BEHALF OF ADAM TITUS WAMAI,
DECEASED,
WINFRED WAMAI,
ANGELA WAMAI,
DIANA WILLIAMS,
JOHN MURIUKI,
LLOYD WAMAI,
TITUS WAMAI,
MILLY MIKALI AMDUSO,

**JOHNSTONE M ANDAYI, ON
BEHALF OF JAMES MUKABI,
DECEASED,**

JUSTIN AMDUSO,

BEATRICE AMDUSO,

JOAB AMDUSO,

IREEN SEMO,

GEORGE MAGAK MIMBA,

NANCY MIMBA MAGAK,

JAMES NDEDA,

ROSELYNE NDEDA,

VALENTINE NDEDA,

MAUREEN NDEDA,

PATRICK OKECH,

PHELISTER OKECH,

BELINDA CHAKA,

MURABA CHAKA,

JAMES CHAKA,

STANLEY CHAKA,

STACY CHAKA,

CORNELIUS KEBUNGO,

PHOEBE KEBUNGO,

CLIFFORD TARIMO,

ELIZABETH TARIMO,

MARGARET TARIMO,

HESBON LIHANDA,

GLADIS LIHANDA,

DICKSON LIHANDA,

RUTH LIHANDA,

**MERCY NYOKABI MAGOTHE
(NDIRITU), ON BEHALF OF MOSES
KINYUA, DECEASED,**

DENNIS KINYUA,

EDWIN MAGOTHE,

MERCY NDIRITU,

CHRISTOPHER NDIRITU,

VALERIE NAIR,

TANYA NAIR,

SEDRICK NAIR,

JOTHAM GODIA,

GRACE GODIA,

ERASTUS NDEDA,

CECILIA NDEDA,

ANN SALAMBA,

BEVERLYNE NDEDA,

BELINDA AKINYI ADIKA,

**GRACE NDONGA NJOROGI, ON
BEHALF OF BERNARD MACHARIA,
DECEASED,**

CAROLINE NGUGI KAMAU,

DIXON INDIYA,

JOSHUA MAYUNZU,

JULIUS NZIVO,

**JOYCE AUMA OMBESE ABUR , ON
BEHALF OF ERIC ABUR ONYANGO,
DECEASED,**

JOYCE ONYANGO,
BARNABAS ONYANGO,
CONCEPTOR ORENDE,
JULIANA ONYANGO,
KELESENDHIA APONDI ONYANGO,
MARITA ONYANGO,
PAUL ONYANGO,
TILDA ABUR,
ROSEMARY ANYANGO OLEWE , ON
BEHALF OF FRANCIS OLEWE
OCHILO, DECEASED,
ROSEMARY OLEWE,
CHARLES OLEWE,
JULIET OLEWE,
WENDY OLEWE,
WILFRED MAYAKA NYANGORO, ON
BEHALF OF LYDIA MURIKI
MAYAKA, DECEASED,
NYANGORO MAYAKA,
DEBRA MAYAKA,
DIANA NYANGARA,
DICK OBWORO MAYAKA,
DOREEN MAYAKA,
MARY TERESA KWAMBOKA
ONSONGO, ON BEHALF OF EVANS
ONSONGO, DECEASED,
MARY ONSONGO,
BERNARD ONSONGO,
EDWIN ONSONGO,

ENOCH ONSONGO,
GEORGE ONSONGO,
GLADYS ONSONGO,
GRACE (EUNICE) ONSONGO,
PININA ONSONGO,
PERIS ONSONGO,
SALOME ONSONGO,
VENICE ONSONGO,
FAITH WAMBUI KIHATO, ON
BEHALF OF TONY KIHATO IRUNGU,
DECEASED,
FAITH KIHATO,
ANNAH WANGECHI,
JACQUELINE KIHATO,
STEVE KIHATO,
SARAH ANYISO TIKOLO NAMAI ,
ON BEHALF OF GEOFFREY MOSES
NAMAI, DECEASED,
SARAH TIKOLO,
NIGEEL NAMAI,
EMILY MINAYO,
HUDSON CHORE,
LESLIE SAMBULI,
HARRIET CHORE,
FRANCIS MAINA NDIBUI,
WINFRED MAINA,
JOMO MATIKO BOKE,
JOMO MATIKO BOKE, ON BEHALF
OF SELINA BOKE, DECEASED,

ZAKAYO MATIKO,
JACOB GATI,
JOASH OKINDO,
LYDIA NYABOKA OTAO OKINDO,
TOBIAS OYANDA OTIENO,
RACHEL OYANDA OTIENO,
LYNETTE OYANDA,
LINDA OYANDA,
VERA JEAN OYANDA/ FELOGENE?,
JOAN ADUNDO,
BERNARD ADUNDO,
THERESA ACHIENG ADUNDO
SALVATORI , ON BEHALF OF
THOMAS ADUNDO, DECEASED,
PAULINE ADUNDO,
SAMUEL ADUNDO,
THERESA ADUNDO,
ISIDORE ADUNDO,
ANNE ADUNDO,
CHRISTANT HIZA,
VALENTINA HIZA,
CHRISTOPHER HIZA,
CHRISTIANSO HIZA,
CHRISTEMARY HIZA,
WYCLIFFE OKELLO KHABUCHI,
JANE KHABUCHI,
BERYL SHIUMBE,

IRENE KHABUCHI,
MICHAEL TSUMA,
ZACKARIA MUSALIA ATINGA,
FLORENCE MUSALIA,
VALLEN ANDEYO,
JURUHA MUSALIA,
ELLY MUSALIA,
JOHN ZEPHANIA MBOGE,
SEBA MBOGE SEBA, ON BEHALF OF
ZEPHANIA MBOGE, DECEASED,
RAJABU HASANE NGOZI , ON
BEHALF OF SALIMA ISMAIL
RAJABU, DECEASED,
ELIZABETH MULI-KIBUE,
GAD GIDEON ACHOLA,
KIRUMBA W'MBURU MUKURIA,
MENELIK KWAMIA MAKONNEN,
MARINI KARIMA,
PETER KUNIGO,
TECHONIA OWITI,
SARAH MWENDIA MBOGO, ON
BEHALF OF FRANCIS MBOGO
NJUNG'E, DECEASED,
SARAH MBOGO,
ANN MBOGO,
EPHANTUS NJAGI MBOGO,
ISAAC KARIUKI MBOGO,
MISHECK MBOGO,
NANCY MBOGO,

NEPHAT KIMATHI MBOGO,
REUBEN NYAGA MBOGO,
STEPHEN NJUKI MBOGO,
PATRICK LOCH OTIENO
LUMUMBA, ON BEHALF OF LUCY
GRACE ONONO, DECEASED,
HELLEN LESLIE ACHIENG ONONO,
ON BEHALF OF MORDECHAI
THOMAS ONONO, DECEASED,
ANDREW ONONO,
ELIZABETH OKELO,
HELLEN OKELO,
KENNEDY OKELO,
LAURA ONONO,
LESLIE ONONO,
RISPAH AUMA,
RONALD OKELO,
STEPHEN ONONO,
DOREEN NASIEKU PUSSY, ON
BEHALF OF RACHAEL MUNGASIA
PUSSY, DECEASED,
ESTHER NAISIAE PUSSY, ON
BEHALF OF SAMUEL PUSSY,
DECEASED,
ANDREW PUSSY,
AUDREY PUSSY,
DOREEN PUSSY,
ELSIE PUSSY,
ANASTASIA GIANOPULOS, ON
BEHALF OF PHAEDRA
VRONTAMITIS, DECEASED,

ANASTASIA GIANPOULOS,
ALEXANDER VRONTAMITIS,
LEONIDAS VRONTAMITIS,
PAUL VRONTAMITIS,
EPHRAIM WAITHAKA RUTHA, ON
BEHALF OF LUCY NYAWIDA
KARIGI, DECEASED,
CAROLINE KARIGI,
MARTIN KARIGI,
STEVEN KARIGI,
THE ESTATE OF DAVID KIARIE
KIBURU
JUDY KIARIE,
ANTHONY KIARIE,
BARBARA KIARIE,
EDMUND KIARIE KIBURU,
BARBARA MULI,
STEPHEN MULI,
AARON MAKAU NDIVO,
LYDIA NDIVO MAKAU,
FAITH MUTINDI,
AARON MAKAU NDIVO, ON BEHALF
OF JOYCE MUTHEU, DECEASED,
REGINAH ALANDO OWITI, ON
BEHALF OF DANIEL OWITI OLOO,
DECEASED,
DOLPHINE ACHIENG OWITI, ON
BEHALF OF MAGDALINE OWITI,
DECEASED,

**BEATRICE MUGENI BWAKU, ON
BEHALF OF BENSON BWAKU,
DECEASED,**

BEATRICE BWAKU,

EPHRAIM ONYANGO BWAKU,

CHRISTINE NABWIRE BWAKU,

**PHOEBE NYAGUTHII NDEGWA, ON
BEHALF OF BENSON NDEGWA,
DECEASED,**

PHOEBA NDEGWA,

**EDWIN MICHAEL OYOO, ON
BEHALF OF JAELE OYOO,
DECEASED,**

EDWIN OYOO,

JOSEPH ABDALLAH,

MAJDOLINE ABDALLAH,

RISPAH ABDALLAH,

PAULINE ABDALLAH,

FREDERICK KIBODYA,

FLAVIA KIYANGA,

DIANA KIBODYA,

JOHN NDUATI,

MARGARET MURIGI,

BELONCE MURIGI,

FAITH MURIGI,

MISCHECK MURIGI,

**RASHID SELEMANI KATIMBA, ON
BEHALF OF KATIMBA MOHAMED
SELEMANI, DECEASED,**

SAID KATIMBA,

ASHA ABDULLAH,
RASHID KATIMBA,
PATRICK NYETTE,
PATRICK MBELENZU NYETTE, ON
BEHALF OF ROSE NYETTE,
DECEASED,
MICHAEL IKONYE KIARIE,
JANE IKONYE KIARIE,
ANN WAIRIMU KIARIE,
DANIEL KIARIE,
MARYANN NJOKI KIARIE,
SAMMY NDUNGU KIARIE,
CAROLINE WANJIRU GICHURU,
ALICE NJERI GACHAU, ON BEHALF
OF CHARLES KABUI, DECEASED,
JOSEPH INGOSI,
JULIUS NYAMWENO,
MICHAEL NGIGI MWORIA,
GRACE NJERI GICHO, ON BEHALF
OF PETER MACHARIA, DECEASED,
GRACE GICHO,
ANN RUGURU,
ALICE WAIRIMU GICHOYA, ON
BEHALF OF DAVID NGUGI,
DECEASED,
DIANA MACHARIA,
JOHN NGUGI,
THE ESTATE OF MARGARET NJOKI
NGUGI
THE ESTATE OF NGUGI MACHARIA

PAUL NGUGI,

PETER NGUGI,

STANLEY NGUGI,

**ELIZABETH VUTAGE MALOBA , ON
BEHALF OF FREDERICK MALOBA,
DECEASED,**

ELIZABETH MALOBA,

BELINDA MALOBA,

DERRICK MALOBA,

**MARGARET ONYACHI MALOBA, ON
BEHALF OF FAITH MALOBA,
DECEASED,**

KENNETH MALOBA,

LEWIS MALOBA,

MARGARET MALOBA,

MARLON MALOBA,

SHARON MALOBA,

STEVEN MALOBA,

**VINCENT OWOUR ODERO, ON
BEHALF OF JOSIAH OWUOR,
DECEASED,**

VINCENT OWUOR,

**OSBORN OLUOCH, ON BEHALF OF
EDWINA OWUOR, DECEASED,**

WARREN OWUOR,

**MARY SALIKU BULIMU , ON
BEHALF OF HESBON BULIMU,
DECEASED,**

MERCY BULIMU,

MARY BULIMU,

MILLICENT BULIMU,

GODFREY BULIMU,

LYDIA BULIMU,

RODGERS BULIMU,

FRIDA BULIMU,

EMMILY BULIMU,

JACKSON BULIMU,

**PENINAH AKHWALE MUCHI, ON
BEHALF OF LOISE KUYA,
DECEASED,**

**PENINAH AKHWALE MUCHI, ON
BEHALF OF PETER KUYA,
DECEASED,**

PENINAH MUCHI,

DANIEL KUYA,

HARRISON KIMANI,

GRACE KIMANI,

CHARLES MWAKA MULWA,

KATHERINE MWAKA,

ERIC MWAKA,

PETER MWAKA,

**CHARLES MWAKA MULWA, ON
BEHALF OF FELIX MWAKA,
DECEASED,**

CIVILIER MWAKA,

**YVONNE T BOCHART, ON BEHALF
OF GERALD BOCHART, DECEASED,**

YVONNE BOCHART,

LEILANI BOWER,

**ROSELYNE INDEKWA OCHOLA, ON
BEHALF OF CHARLES OCHOLA,
DECEASED,**

**ALICE SAISI OCHOLA, ON BEHALF
OF RAE L OCHOLA, DECEASED,**

DOREEN OPORT,

PHILEMON OPORT,

JOANNE OPORT,

YVONNE OPORT,

SALLY OPORT,

**GITONGA MWANIKI, ON BEHALF
OF MARY GITONGA, DECEASED,**

GITONGA MWANIKE,

PRISCA OWINO,

**PRISCA AKINYI OWINO, ON
BEHALF OF GREG OWINO,
DECEASED,**

CLARA OWINO,

KENNETH OWINO,

LEAH OWINO,

GERALD OWINO,

BLASIO KUBAI,

AGNES KUBAI,

COLLIN KUBAI,

CELESTINE KUBAI,

SALINE KUBAI,

BRIAN KUBAI,

GIDEON MARITIM,

HELLEN MARITIM,

ALICE MARITIM,

RUTH MARITIM,

ANNAH MARITIM,
SHEILA MARITIM,
SHARONE MARITIM,
EDGAR MARITIM,
RAMMY ROTICH,
IRENE KUNG'U,
WAMBUI KUNG'U,
LORNA KUNG'U,
EDWARD KUNG'U,
JUSTINA MDOBILU,
ONAEL DAVID MDOBILU,
JOSHUA DANIEL MDOBILU,
ONAEL MDOBILU,
PETER MDOBILU,
JOHN MDOBILU,
KATHERINE MDOBILU,
IMMANUEL MDOBILU,
VICTOR MPOTO,
DENIS MPOTO,
ANIPHA MPOTO,
INSENSIA MPOTO,
JOHN KISWILI,
FRANCISCA KYALO,
HUMPHREY KIBURU,
JENNIFER WAMBUI,
ELIZABETH NZAKU,

KAKA ABUBAKAR IDDI,
LEONARD SHINENGA,
POLYCHEP ODIHAMBO,
WILLIAM MAINA,
THOMAS MONGARE NYANGAU,
ISAAC NYACHWARA MONG'ARE,
JANET KERUBO MONG'ARE,
NATHANIEL MUDUKITSA,
PATRICIA MUAKA,
JELIAN MUSIBURU KISUZA,
DEAN AJEMA KISUZA,
AURELIA MINAGE KISUZA,
KRISTIN NANGA KISUZA,
TECLA MUMBI MWENDWA,
LAURENE MINAYO KISUZA,
JOSEPH ODIRA KISUZA,
JULIUS ANUBI MUDUKIZA,
BERITA EHENZO MUDUKIZA,
DEBORAH ANUBI,
ELIZABETH IMINZA MUDUKIZA,
BARNABUS MOHAMED LIVEHA
ANUBI,
EDWARD JOSHUA BWANYA,
SUSY MALES LIKHAMARA,
BEATRICE KAGAI LOVINI,
FRANCIS HAMISI LIKHAMARA,
SEDRICK LUTSILILI EDWARD,

**WILLIAM ANDOLE EDWARD,
STEPHEN KHAMATI EDWARD,
BONFACE AMUNALA EDWARD,
ERICK LUSULI EDWARD,
BRIAN BWANYA EDWARD,
JACOB NDOLO NGEMU,
MARY NGINA NDOLO,
KIMEU NDOLO,
MULEI NDOLO,
GIDEON NGAATU MUTUA,
DORCAS MWIKALI KIOKO,
MONICA MBEKE MUTUA,
PATRICIA NTHIKWA NGAATU,
REBECCA MBEKE NGAATU,
BERNICE NDUNGE NGAATU,
CLINTON MUTUA NGAATU,
NICODEMUS MUTINDA MUTUA,
ISAAC MUTHINI MUTUA,
PHOEBE MWONGELI NGAATU,
SAMUEL NJOMO,
RICHARD NZOMO MUATHA,
CATHERINE MUTIO NDEKE,
TERESIA KATILE MUTHA,
VICTORIA MUATHA MUTUKU,
PATRICK MBITHI MUATHA,
SUSANNA MUENI MUATHA,**

**BENARD MUNYWOKI MUATHA,
THOMAS MWANZIA MUATHA,
DANIEL HARRISON MBINJI,
ROSEBELLA ASONGA OLOO,
PAULINE AKINYI MBINJI,
NELSON BUKACHI MBINJI,
WINSTON TONNY MBINJI,
GODFREY BRIAN MBINJI,
MBINJI PAUL OKELO,
MBINJI PATRICK AMOYO,
OPUKA NAOMI MBINJI,
ANNAH MBINJI,
SAMUEL KINUTHIA NJOROGI,
MARGARET KIBUI KINUTHIA
NJOROGI,
ALEX WAIHARO KINUTHIA,
ANTONY NJOROGI KINUTHIA,
JAMES CHEGE KINUTHIA,
CAROLINE KABURA KINUTHIA,
JOYCE GATHONI NJOROGI,
FRANCIS KIRIINYA,
TABITHA WANJIKU KARIUKI,
ANTHONY MBAABU KIRIINYA,
ANTONY MURIUKI KIUMBE,
MERCY KENDI,
JUDITH KAARI MUKINDIA,
JANE MPARU MUKINDIA,**

WILSON NGALAME MWACHI,
CAROLINE IMBANDU,
JOTHAM MUCHENDE,
JANET AYELA,
NELSON MUTASHE WASWA,
BENEDICT M'MBALIA IMBWAGA,
SARAH LUMADI KISALI,
RIDDICK ITEBETE,
DERRICK ITUMBIRI,
MELDRINE KHAHUGANI,
FRANCIS OKWERO OBADIA,
SIFUROS MAKOKHA MUKHWAYA,
THE ESTATE OF LONGINO OBADIA,
PASKALIA AKUMU SOTSI,
WYCLIFE OKWERO,
TOBIAS OKWERO,
MILDRED BAHATI OKWERO,
ENOCK TARACHA WERE,
SOLOMON MWANIKI KAVILA,
FESCAH MAWIA MWANIKI,
JAMES MWENDWA KAVILA,
MUSILI KAVILA,
STEPHEN MUKUNGI MUTUNGA,
MWIKALI MUKUNGI.,
LYDIA MUTANU MUKUNGI,
CHRISPHINIA MWENDE MALOMBE,

ANNASTASIA KATHINI KANGANGI,
ROBERT MWANGANGI MUTUNGA,
LAWRENCE MAINA GIITHINJI,
TERESIA WANJIRU MAINA,
RUTH WAIRIMU KINGORI,
JOHN MWANGI GITHINJI,
JACKLINE NJOKI GITHINJI,
SERAH WANJIKU MAINA,
JAMES MUTINDA KIITI,
JUCINTA NZILANI KISIA,
THE ESTATE OF KIITI MULWA
MUTHIW'A,
THE ESTATE OF MARTHA MBEKE
KIITI,
MOSES SIKUKU MUTINDA,
ZACHARY KAKULI KILONZO,
THE ESTATE OF MALI KIIMA,
MUTEMI KILONZO,
PATRICK MWASYA KILONZO,
MUSILI KILONZO,
JOSHUA SYENGO KILONZO,
DAVID GIKONYO MBUGUA,
MNIRA MOHAMMED,
KHALFAN NGUGI GIKONYO,
ABDI NG'ANG'A GIKONYO,
ALI THIMUI GIKONYO,
ISHAQ MBUGUA GIKONYO,

DAVID K. OMOSA,
VINCENT ONDARI OMOSA,
JAMES NYAKENANDA OMOSA,
JANE NYAMCHAMA ONWONG'A,
WYCLIFF MOMANYI OMOSA,
HYLINE MORAA OMOSA,
JANE KWAMBOKA OMOSA,
JOSEPH KYALO MBUVI,
THERESIA KAVULI MBUVI,
THOMAS MUNYAO MBUVI,
MWENDE MBUVI,
PATRICK WASYA MBUVI,
BENSON ATWOTO OBUYIYI,
HELLEN ANDIWA ATWOTO,
PETER NYANGOLO ATWOTO,
EDWARD ATEMO OTIANG'A,
TITUS KINYAMASYO MBUSU,
ANNAH NDUNGE MUSEMBI,
MIRRIAM MUTHEU TITUS,
ERIC MUKAVI MBUSU,
MCDONALD KWINGA NDAVI,
STELLA NAIRUKU LEMEREU,
BRISBANE JOHN NDAVI,
DAVID MUTUA MUTUNE,
JOYCE MWENDE WAMBUA,
JOYCE MUENI MUTUNE,

**NDUNGE MUVEVI NDOLO,
ZADOCK KIPENDI MAGOMERE,
OSCAR NASIALI KIPENDI,
ERICK KIPENDI,
JUSTUS KIPENDI,
LINAH KIPENDI,
HARRISON KIPENDI,
GEORGE LUVINZU,
BANITO MAKOLO,
BEATRICE MWAVISHI,
JANET IMALI,
MARY SHAYENZA,
PETER KITEMA NDANDU,
SUSAN NZILANI MBALUKA,
JANE KATHINI NDANDU,
NDANDU KITEMA,
JOHN KOMU NDANDU,
REBECCA KAILU WAMBUA,
JOSEPH MUTINDA NDANDU,
JAMES FRIDAY WAFULA,
JUDITH LADU OKELLO,
ROSELYDIA NEKESA WAFULA
NDASU,
ALFRED MEMBA MICHIEKA,
EZNAH KWAMBOKA MANGERA,
THE ESTATE OF MICHIEKA
MOGAKA NYATENGA,**

**ROBERT MORWABE MICHIEKA,
FLORENCE KERUBO MICHIEKA,
TERESAH NYABOKE MICHIEKA,
ABEDNEGO MUTUA NDIVE,
JOSEPHAT MUASA NDIVE,
WILSON ANGATIA OWELWA,
CHRISTABEL KHATIALA
MUKABWA,
KETRAY ANONO ANGATIA,
LENAH ASASIA INONDA,
MORRIS KILONZO SUMBI,
STEPHEN MUTUA KILONZO,
DANIEL MUSILI MAILU,
RHODA MUTHAKYE MUSILI,
SAMUEL WAMBUA MUSILI,
ESTHER KATHINI MUSILI,
WALTER NYANCHOKA,
ALLFRED ONGORI NYANCHOKA,
TERESA KWAMBOKA ATIKA,
JOYCE NYABONYI NYANCHOKA,
EDITH OBONYO NYANCHOKA,
MARTHAR NYAMBEKI
NYANCHOKA,
MUEMA MAKAU,
MARY MUENI MAKAU,
ALICE WANZAU MAKAU,
JAPETH KILONZO MUSILI,**

NAOMI KYAMBI KILONZO,
THE ESTATE OF TABITHA NDUKI
MUSILI,
THE ESTATE OF MUSILI MWATWA
NZULI,
MARTHA MAKASI KYUNDU,
JOSEPHINE MUMBI KILONZO,
PENINNAH MUTINDI VUNDI,
ELIZABETH MWENDE MUTUVI,
BENJAMIN MUTUA KILONZO,
AGNES MUNANIE,
KAMENE MWINZI,
KIVAU MUTHUI,
KANINI MUEMA,
MUSYA MUSILI,
JOSEPH MUSYOKA MUSILI,
KENNEDY MWAKI ODALI,
KELVIN INAMBILI,
GETRUDE ANYANGA,
ONESMUS MUTISYA MUNGUTI,
FELISTUS NZAMBI MUE,
MUSYIMI MUTISYA,
ALEX MWONGELA MUTISYA,
JAMES MUTISYA,
EDWARD ORINA NYANUMBA,
THOMAS MAYAKA NYANUMBA,
EVANS GITENYA NYANUMBA,

**WILLIAM TUBMAN VISIBWA,
JANE IMINZA ATINGA,
JANUARIUS KILONZO MUTISYA,
DORIS KAVINDU KILONZO,
JOSEPH NZINGA KAAMBA,
TELESIA NDUTA NZINGA,
JEREMIAH MATUKU NZINGA,
TITUS KAKULU KITUNGUU,
BOAZ OBOTE SHIVISI,
RODAH IMBAYI NGAIRA,
ABISHACK KHABONJI OBOTE,
EDWIN MANJICHI OBOTE,
JUSTINE LUMBAYA SHIVISI,
FRANCIS SHIKALO SHIVISI,
JOSHUA MWANZIA KISILU,
CATHERINE NTHENYA MWANZIA,
NOOR ABDI HASSAN,
RASHID NOOR ABDI,
MOHAMMED NOOR ABDI,
PATRICK OBUYA AMBAKA,
ESTHER GIBENDI ODARI,
SILAS AMBAKA OBUYA,
JULIUS VIKOKWA SHIVISI,
NANCY OMINAH KEYA,
KHAVONJI LOURINE BIKOKWA,
WELLINGTON NDUSI SHIVISI,**

NICHOLAS OKONG'O NYAMOTA,
EUNICE PENDEZA OKONGO,
ALOYS NYAMOTA NYACHOTI,
HELLEN NYAKERARIO NYAMOTA,
SAMWEL MAYIANDA NYAMOTA,
EZEKIEL OSIAGO NYAMOTA,
ENOCK NYAMOTA OKONGO,
JOHN OMBOGA NYAMOTA,
REUBEN MUNYASA AMALEMBA,
CAROLINE IGAITTA MBAKAYAH,
KEVIN AMALEMBA ONZERE,
CHRISTOPHER MUSAMALI
AMOGOLA,
EVALYNE MBONE ASHIUNDU,
PRISTON MURUMBUTSA
MUSAMALI,
SHEILA MUSIYA MUSAMALI,
BONFACE ALIONG'O AMOGOLA,
EDWARD SIMIYU WAFULA,
WILLIAM MWANGI GATHUMA,
JANET WANJIKU MWANGI,
SAMWEL KINYANJUI NJOROGI,
MARION NJERI MAHIA,
JOYCE NJOROGI,
LILIAN WANJIKU KINYANJUI,
DUNCAN NJOROGI KINYANJUI,
RUTH NJERI NJENGA,

STANLEY MARARO NJORGE,
DAVID GICHUHI NJORGE,
SAMUEL NGURURU NJORGE,
GEOFFREY NJATHI NJORGE,
MARGARET WAMBUI MBURU,
ONESMAS MUTWIWA KILENGWE,
THE ESTATE OF JOSEPHINE
NZEMBI MUTWIWA,
KILONZO MUTIWIWA,
CONCEPTA KAVINDU MUTWIWA,
FELISTUS MUMBUA MUTWIWA,
VERONICAH NGINA MUTWIWA,
AUGUSTINE MUOKI MUTWIWA,
THE ESTATE OF PETER WAHINYA
WAMBU,
FELISTAS NDUTA WAHINYA,
PAUL KIBURI WAHINYA,
SALOME WANGUI NJORGE,
MARGARET WANJIRU WAHINYA,
LUKAS WAMUTU WAHINYA,
HILLARY KIHARA WAHINYA,
PIUS BARASA KACHILA,
CHRISPINUS WANYONYI KACHILA,
ELPHAS WANJALA KACHILA,
MIKE SIMIYU KACHILA,
MIKE SIMIYU KACHILA,
MUTHENGI MWANZA,

DORCAS MUENI MUTHENGI,
EVERLYNE NZAKYE MUTHENGI,
TABITHA NYAMAI MWANGANGI,
MASAA MUNYOKI KAWALU,
NGOKI KYALO MUTISYA,
MWATHI MWANZA,
EDWARD ARASA AMENYA,
MOSES CHIKATI,
THE ESTATE OF DOROTHY
KHATETE KADENGE,
THE ESTATE OF AGNES KILUYI
CHIKATI,
WILLIAM WAMBASI CHIKATI,
GEORGE OBURA DWALO,
JENIFA ATIENO DUALO,
CYNTHIA AWUOR OBURA,
NANCY ACHIENG OBURA,
ENOS ONYANGO DWALO,
JAMES OTIENO OPERE,
MORLINE AKINYI BAKER,
GEORGE OWINO OLIMA,
MARKS OTIENO OPERE,
NEVIL OMONDI OTIENO,
SILVESTER KIPTANUI,
AGNES CHEPCHIRCHIR TANUI,
SIMION KIPLIMO TANUI,
GETRUDE CHEBET,

PETER NGUSA MAKUNDI,
JANET KANINI MUNYUNGU,
GEORGE MUTINDA MAKUNDI,
ONESMUS MUSYOKI MAKUNDI,
REUBEN MUSAU MAKUNDI,
ANNA MWIKALI MUTISO,
PHYLES MUNINI MBALUTO,
SIMON BOAZ ONAMI,
ONESMUS SAMMY MULAA,
DAMARIS NDULULU MUSYOKA,
THE ESTATE OF ESTHER MWANZA
MULAA,
MARY WAUSI MUANGE,
GERALD MBUVI MULAA,
NASHON JUMA KHISA,
PETER KIARII KUNGU,
ESTHER MUTHONI KIARII,
GRACE WANJIRU KIARIE,
CHARLES KUNGU KIARIE,
MARGARET WANGARI GATHIRU,
ESTHER WANGUI KARIUKI,
RUTH NJERI MURITHI,
HENRY NGUGI KUNGU,
MICHAEL MWINAMO,
JOSEPH NDUNGU OMBOGA,
MOSES OKWOMI,
VERONICA NAFULA OKWOMI,

MILDRED ANYANGO OKWOMI,
DORINE TAKA OKWOMI,
GETRUDE NABWIRE ADENYI,
DAVID CHERUYIOT LANGAT,
AGNES CHEPTOO LANGAT,
JOHN KOECH LANGAT,
WILSON ARAP LANGAT,
AGNES CHEMUTAI CHAMTANY,
ALICE CHEROTICH LANGAT,
ULBANUS MULI KAWENE,
JANE MUTUMI MUASA,
JACINTA MINOO,
REDEMPTA MUTINDI KAVILI,
GABRIEL MUTUNGA KAWENE,
CATHERINE MBITHE MUTUNGA,
PATRICIA MUKONYO WAMBUA,
PHILES NDANU MWENDWA,
MICHAEL MASILA,
DOUGLAS MALOMBE,
MARY MWENDWA,
LUCY MUNYIVA,
FAITH NYIVA MWENDWA,
JOHNSTONE MUATHA MWENDWA,
BENSON MUMO MWENDWA,
RACHEAL MWENDWA,

**PHILES MWENDWA,
REPRESENTATIVE OF THE ESTATE
OF BONIFACE MWENDWA,

JOSEPH MUTIE KITHOME,

JANET WANGIRI MUTIE,

HALII MUTIE,

MARTHA MWIKALI MUTIE,

EDWARD KHASAKHALA OWALLA,

DEBORAH AYIDI ATEMU,

HENRY MUCHULE OWALLAH,

JOSEPH MUKHAYE ATEMU,

MARY NYAKOA KHASAKHALA,

AMOS OMBISI MUCHULE,

ESBON MUCHOKI,

JUDY KARIMI MUCHOKI,

MONICAH NJERI MUCHOKI,

MOSES NG'ANG'A MUCHOKI,

PETER MUYA NGANGA,

HANAH MUGURE NGUGI,

JOHN KINYANJUI NG'ANG'A,

JESEE KAMAU NGANGA,

GILBERT MWENDWA MUSILI,

ROSE MALI MWENDWA,

CHARLES MUTEMI MWENDWA,

MAGRET MWIKALI MWENDWA,

PATRICIA MUNANYE MWENDWA,

AGNETOR MUTETHYA MWENDWA,**

**GRACE MWENI MWENDWA,
SUSAN MWENDE MWENDWA,
ANNAH NDANU MWENDWA,
WILLIAM NDUNGU NJUGUNA,
THE ESTATE OF NJUGUNA
KAMUHURO,
THE ESTATE OF EUNICE NUNGA
NJUGUNA,
STEPHEN MACHARIA NJUGUNA,
CONSOLATA NJOKI NJUGUNA,
AMBROSE NGOLOI NZUKI,
CATHERINE MUTINDA NDAU,
MASAI NGOLOI,
AMOS MUTUA NZUKI,
EVANS E. MUSUMBA,
JACKLINE KALUKI MUTISO,
FRANCIS MUSUMBA,
ISABELLA DIANA EGESA,
ELIZABETH AUMA,
TITUS MUSUMBA,
DAVID AMANI MBAYA,
EUNICE TAAKA,
JANET NANDWA,
ERASTUS MBAYA,
EDMOND MBAYA,
GRACE MBAYA,
THE ESTATE OF MARY MUMBI,**

**THE ESTATE OF RUTH TWIST
MBAYA,

ABRAHAM MUTURI NGARUIYA,

LUCY WANJA MUTURI,

NGARUYA NJOROGE KARIUKI,

MUTHONI MUTURI JANE,

DANIEL KARIUKI MUTURI,

ELIZABETH MUMBI MUTURI,

RUTH MUTHONI MUTURI,

MUTUKU KYENGO,

AGNES MUUTE MUTUKU,

ELIZABETH MUMBI MUTUKU,

STEPHEN MWONGELA MUTUKU,

ANTHONY KIOKO MUTUKU,

NELSON NYONGESA MASINDE,

CAROLYNE OPONDO OLOO,

IRENE WESONGA NYONGESA,

KELVINE NYONGESA WAMBANI,

ASMAN MAKONJIO OLOO,

SHABAN SUNGU WAMBANI
MAKOKHA,

LEWIS NJIRU JOHN,

EVANGELINE WANJIRU NYAGA,

ENOCH MUSANGO MALUKI,

TITUS KAVISI MALUKI,

MASON NGONDU KASINA,

ELIZABETH KALILWA NG'ONDU,**

KATHINA KASINA,
MAURICE MBUVI NGONDU,
PENNINAH KOKI KASINA,
MUSEE KASINA,
MUTHISYA KASINA,
PENINNAH KATUKU PETER,
JOSHUA MUNYOKI NGOLWA,
MALIA MUNYOKI.,
ANTONY NGOLWA MUNYOKI,
PRISCILLA MWIKALI MUNYOKI,
MONICA KAVINYA MUNYOKI,
GRACE MUKILE MUNYOKI,
BONIFACE MUTINDA KAKULI,
WINFRED MUMO MUTINDA,
JACKSON MUTISO MUTINDA,
LUCY NDILA MUTINDA,
RONALD KEDOGO ATUNYA,
CHARLES NAMISI SIFUMA,
CHARLES SAMMY SIMWELO,
KENNEDY OCHEGO ONTWEKA,
THE ESTATE OF BEATRICE MORAA
OCHEGO,
ELIZABETH NYABOKE ONTWEKA,
SOPHIA MORAGWA OCHEGO,
PHILIP ONTWEKA OCHEGO,
JOHN SAGWE ONTWEKA,
ONTWEKA OMOKE SAMUEL,

MOSES MONCHANCHA ONTWEKA,
FRANCIS MAURU OSORO,
AIDAH KERUBO MAURU,
JOYCE NYAMBEKI ORINA,
PERIS SELINA NAURU,
FRANCIS ONSARIGO CALFRED,
CLARE MOKEIRA ORINA,
WARIO KATELO TADICHA,
THE ESTATE OF GEORGE BARASA
OUMA ,
JULIET NAFULA BARASA,
ROTEMITA NAMULEMBO OUMA,
PRISCAH ADHIAMBO BARASA,
WINFRY ADIJA BARASA,
JOSEPHAT WAMALWA BULUMA,
JUDITH OMUKOIYA OLWAKA,
HELLEN ANYANGO WAMALWA,
PATRICK OTSIENO KUTOYI,
CHARLES WABALA,
EPHALINE AWINO RAUCHU,
BELDAN NYAWALO OLUM,
LUCY ADOYO OTIENO,
COLLINS ODHIAMBO NYAWALO,
ZADOCK OTIENO NYAWALO,
ENOCK GUDWA ZEDEKIAH,
BEVERY CHARUMA,
DANIEL MUTISYA MULI,

**ALFRED MASIKA WAFULA,
DICKSON ONJWAYA WASIKE,
MIKE ALLAN OJWAYA,
EVANS MUDIGULULI AHUTA,
YVONNE VIHENDA AHUTAH,
EMMAH KHALEJI NATASHA,
MERCY KULANYO AHUTAH,
IRIS MMOHOLAH AHUTAH,
SILAS CHITIVA AHUTA,
KENNEDY KOINA MOSE,
JOHN UBEYA LIBESE,
JESCAH MANDERA MWANGE,
KEVOGO FRANCIS OBEYA,
ADDAH MINYOSO OBEYA,
JACKLINE MWANIGA,
JEREMIAH LIKONO MWENDWA,
THE ESTATE OF BEATRICE
LIAYUGA ONZERE,
REUBEN MBURU,
BETH WAMORO NJEMI,
SERAH NJERI MBURU,
MILLIAM NJERI MBURU,
EKILAH NJOKI MBURU,
EDWARD NJAMI MBURU,
JULIUS KILONZO MUTUA,
EUNICE MUENI KILONZO,
CHRISTINE NDUNGE KILONZO,**

MARION NTHENYA KILONZO,
JASON OTENYO BABU,
MOSES BARNABA OKOITI,
REBECA AMUOTOK EMOMERI,
WYCLIFFE EMOMERI,
LUCY ISIYA OKOIT,
BRAMUEL OKOITI,
KENNEDY WANJALA MAUBE,
WINBRODA NASAMBU WESAMBA,
PATRICK NJUGUNA NGURE,
CHARLES OTOK AWUOR,
SAMUEL MUTINDA KITILI ,
MULEMBO SAMUEL,
KITILI MUTUA,
THE ESTATE OF GEORGE
MESHACK ODHIAMBO,
DENIS GWALA ODHIAMBO,
MICHAEL OKUMU OBUYA,
MOHAMED MUKTAR BULLE,
HALIMA HASSAN AHMED,
AMINA MOHAMMED MUKTAR,
ZAHARA MOHAMMED MUKTAR,
ABDI MOHAMMED MUKTAR,
DOMINIC OYARO GISEMBA,
JOHN NJENGA MUIRU,
TERESIA WAIRIMU KAMAU,

**JOHN MUIRU, REPRESENTATIVE OF
THE ESTATE OF IBRAHIM MUIRU
KAGUNDA,**

MARY WANJIRU MUIRU,

CAROLINE WANJIRU NJENGA,

PETER MWITHIGA MUIRU,

JANE WAMBUI MUIRU,

WALTER KAMAU MUIRU,

JOSEPH KAMAU MUIRU,

HEZEKIEL KEVOGO AYERA,

PHYLIS ANEYO AMBETSA,

ALVIN EMOLI KEVOGO,

PHELIMACE KADENYEKA AYELA,

WESLEY OMBATI NYAKUNDI,

GLADYS KERUBO SUBANO,

DAVID JUMA MASHINDE,

DINAH KHISA MASINDE,

LOICE KHAMALA MASINDE,

MOHAMED ABDI ALI YARE,

EVANS WANYONYI WESWA,

PROTUS WAMALWA WANYONYI,

BENSON MUSAU KIOKO,

MONICAH SYOMBUA MWANZA,

MARY KALONDU MUSAU,

PHORSTINE JUMA NDALIRA,

MICHAEL KABUCHWA GITHAIGA,

JANE WAIRIMA MACHARIA,

SCOLASTICA WAIRIMU
KABUCHWA,

PATRICK MACHARIA KABUCHWA,

ERICK GITHAIGA KABUCHWA,

GEORGE ODUOR OOKO,

PAMELA AUMA ODUOR,

GILLIAN AKINYI ODUOR,

ROSEMARY MAJUMA OMBUGE,

IRENE AKUMU ODUOR,

GRACE AMONDI ODUOR,

MILDRED ATIENO ODUOR,

ALICE MOLLO ODUOR,

PETER LULIMU AMBENGE,

PHANICE ATEMA KILANDE,

MAXWELL AMBENGE MULUSA,

MILLICENT KHANGUHA AMBENGE,

BENARD AYUDI LULIMU,

WILLIAM KIJILANGAT SEGERGER,

LILY CHEROTICH SEGERGER,

FAITH CHEPKORIR,

IMMANUEL KIBET,

WELDON LANGAT,

KISILU KIMUNA,

ELIZABETH KANINI KISILU,

PATRICK MWONGELA KISILU,

RICHARD MULILI KISILU,

CHRISTOPHER MULI KISILU,

VERONICAH KAMBUA KISILU,
DAVID SIMIYU WANJALA,
OPERE KENNEDY OUMA,
HELLEN ANYANGO OUMA,
MACKLINE AWUOR OUMA,
BELINDA AKINYI OUMA,
EVERLYNE AKOTH OUMA,
HEMPSTONE ODHIAMBO OUMA,
KELVIN MUKALA SHAMALLA,
REGINA AKEYO OGAYO,
DAVID KIPLANGAT TURGUT,
STEPHEN MONGARE NYASWABU,
PATRICIA NDINDA NZIOKA,
GEORGE KENYANI KIKUBU,
TIMOTHY ODHIAMBO NYAKIDI,
LINET AOKO ODHIAMBO,
ZADOCK AMADI ODHIAMBO,
NYAKIDI OTIENO GORDON,
WILSON MULINGI PHILIPH,
JANET WANZA MUTUKU,
PHILIP MALILE MAWEU,
JOSEPHINE KATUMBI PHILIP,
JOSEPH MWENDWA MUTHUI,
MUTHUI MBOLO,
MULI MUTHUI MBOLO,
PETER MWANDIKWA MUTHUI,

KENNETH WAWERU KAMANGA,
CATHERINE WAITHIRA KIGOTHO,
THE ESTATE OF JAMES KAMANGA
WAKABA,
THE ESTATE OF RUTH MUTHONI
KAMANGA,
WINNIE MUTHONI WAWERU,
JAMES KAMANGA WAWERU,
STEPHEN OUMA AYANGA,
THE ESTATE OF PETRONALA
AGOLA AYANGA,
JARED AGUKO AYANGA,
MATHEWS ONOKA AYANGA,
THE ESTATE OF JOSEPH OURU
AYANGA,
ESTHER MOGORE,
REPRESENTATIVE OF THE ESTATE
OF JULIUS MWITA CHACHA,
ESTHER MOGORE,
REPRESENTATIVE OF THE ESTATE
OF PAULINA WEGESA CHACHA,
ESTHER GATI MOGORE,
RAHEL BOKE MAROA,
SUSAN NCHAGWA MOGESI,
PATRICK KUTETE BUYELA,
PAMELA KUBANO,
DERRICK WANJALA KUTETE,
BREVINE BUYELA,
TITUS MUTUA NZUNGO,
KAVULI MUTUA,

JONATHAN NZUNGO MUTUA,
ADAN OSMAN ALI,
SAHARA OSMAN ALI,
OSMAN ALI HUSSEIN,
JARED NYAUMA ONGERI,
NYAMAI KAVILA,
AGNES KAVINI MUMAMI,
THE ESTATE OF REGINA KAVATA
KAVILA,
EUNICE NZULA KAVILA,
THE ESTATE OF DAVID KIBET
KUTO ,
EUNICE CHERONO KERON,
RODAH KWANZIMA SIRMA,
MILTON KIPLAGAT,
DORIS CHEPKEMBOI,
AMOS KIPKOECH KUTO,
ISAIAH KIPKEMBOI KUTO,
SAMUEL KIMAIYO MAGUT,
BARNABAS RUNO SIRMA,
ISAAC KIPROTICH KUTO,
EMMY CHEMELI KUTO,
ISAIAH KIPKEMBOI KUTO,
BARNABAS SIRMA,
SAMUEL KIMAIYO MAGUT,
JONAH KIPLAGAT KUTO,
MWATHANI MUKANDI,

**CHRISTIAN NYONGESA
EKAMURAN,

JOSEPH MUTUKU MUSINGI,

ROSALIA KALEKYE MUTUKU,

MESHACK MUTHUI MUTUKU,

PATRICK KIMEU NZOLI,

WILLINGTON AKALA MUKOLWE,

ELIZABETH MOYI KANDAYI,

CATHERINE KHAMALA MUKOLWE,

NICHODEMUS MWANZIA MWAVU,

JOSEPH MUMO KAVUVI,

CHRISPINUS JUMA KITUYI,

HARRISON WAMBUGU KIMANI,

THE ESTATE OF ELIZABETH
WAITHIRA WAMBUGU,

JOSEPH OMONDI OWINO,

MELISA OKINYO OMONDI,

GEORGE OWINO OMONDI,

MUSA OKOTH OWINO,

CHRISTINE ADHIAMBO OMONDI,

PRISCA APONDI OWINO,

HENRY DENG MOSE,

JEREMIAH MUTUA MUTHUI,

ANTONY TSOMBE OKEDI,

RONALD MISIKO KANDIA,

NATHAN WANYONYI JUMA,

JONES NALIAKA JOASH,**

KENNEDY WANYONYI JUMA,
JENEPHER NASIMIYU JUMA,
EVERLYNE NEKESA JUMA,
PETER MUSIOMI,
OKWARE GEOFFREY BARASA,
MELDA NAWIRE OMUSUGU,
HENRY MARTIN NANDWA NAMAYI,
EMMILY MATUNDO MIHESO,
SIMON BOAZ ONAMI,
PERMINUS KAMAU NGIGI,
JULIA GATHONI NGIGI,
KAMAU BRYAN CHOMBA,
ANDREW NDUNGU NGIGE,
ARTHUR NJAU NGIGE,
JOAN WANJIRU ROBERT,
PHILIS NJERI NGIGE,
LOISE WANGUI NGIGE,
AGGREY AKHAE OTWOMA,
ABDUB GUYO UMUR,
MATI KINGETU,
PAULINE RAEI MATI,
THE ESTATE OF MUTUA
MWANGANGI,
LENAH MWENDE MUTUA,
EUNICE KYAMBI MUTUA,
JAMES KIMANZI MUTUA,
BENSON MUTHAMI MWANGANGI,

CHARLES ODUOR OCHIENG,
KNIGHTY OSIDE SAMIA,
WILBERT SAFERIO SIANGU,
RODAH AYOTI MUKA,
PHILIP WAFULA SIANGU,
FRANCIS ODERO OYANGE,
LILIAN WANJIKU MURIUKI,
REPRESENTATIVE OF THE ESTATE
OF CLEMENT MURIUKI,
PURITY NYAGKUTHII MURIUKI,
MARY WANJIKU MURIUKI,
LILIAN WANJIKU MURIUKI,
SUSAN WANJIRU MURIUKI,
STEPHEN KOMU WANJIKU,
AUGUSTINE MURAYA WANJIKU,
NICHOLAS MWANGANGI KASYOKI,
TERESIA MWENDE MWANGANGI,
THE ESTATE OF KASYOKI KITEME
MUTIA,
MARTIN MUSYOKI MWANGANGI,
DORCAS NZASU MWANGANGI,
BERNARD OUMA MAKOKHA,
CATHERINE BARASA OBBANYA,
KENTI DEMITILAH ORUPIA,
ANTENAR BARAZA MAKOKHA,
MORGAN ODOWA MAKOKHA,
DOMINIC KYAKA,
ESTHER KOLA WAMBUA,

BENARD MUEMA DOMINIC,
NANCY RUGURU GITAU,
FRANCIS GITAU MUNGAI,
DERESHE MUNGAI GITAU,
STEPHEN NGAMIA KALABAYI,
EVERLYNE NAFULA WASWA,
JACKTONE BONFACE KALABAI,
JULIUS WANJOHI,
ASKAH KERUBO OBATI,
FRED MONTE WANJOHI,
PIUS MUTHIKE MBEVI,
JACINTA MUTETE MUTHIKE,
KALUKI MBEKI NZWII,
DOMINIC MUTUKU MUTHIKE,
PAULINE MUENI MUTHIKE,
MARTIN MUTINDA MUTISYA,
ANCENT KYALO MBEVI,
ANGELINE WAYUA MBEVI,
PHELOMENA NDINDA LUKA,
PETER NYAMBUTO KIRIOBA,
ELMELIDA MORAA NYABUTO,
REGINA KERUBO NYABUTO,
ABEL NYABUTO,
WAINAINA JERALD NJERI,
KYALE KITHEMBE,
DOMINIC SAFARI KITHEMBE,

ANTONY MUNYAO KITHEMBE,
BRIGIT MUNYANYE NGEI,
BONIFACE KANYOLO KITHEMBE,
MONICA NZAMBI TULI,
TULI TAMA,
MWISIWA TULI,
YVONNE KAMENE NDAMBU,
LILIAN MWISIWA NDAMBU,
ANDREW KINGOLE TULI,
KIMANZI TULI,
IRENE MUMBI TULI,
HENRY KYALO TULI,
TAMA TULI,
WILSON NGUNDO TULI,
EDWIN MUSYOKA TULI,
DOREEN MWENDE TULI,
GEOFFREY DAVID NDAMBU,
BENEDICT MUSEE NDAMBU,
JOSPHINE TEMEA NDAMBU,
MARTIN OTSIULA WALUSE,
MOSES MUKHONGO WANYAMA,
ANNE MACHUMA BIKETI,
MARY MUKHONGO.,
ELIZABETH NASAMBO
MUKHONGO,
PETER KARIUKI NDUNG'U,
DAVID KIPKIRUI CHESIMET,

JOEL BITIEKA MAGALE,
GEORGE NDONG'A OTIENO,
REUBEN BARASA MASA,
CONCEPTER NABISINO NAMASWA,
MOSES WEKESA SIMIYU,
DAN WANJALA SIMIYU BARASA,
WANYONYI MWANGALA TOSKIN,
THE ESTATE OF EMMNUEL
MWANGALA MUSE,
HARUN SHAMALA SOROBEA,
PHANICE YOBERA SHAMALA,
VIOLET GRACE OSORE SHAMALA,
BRENDA SHIANYISA SHAMALA,
BERYL ISOKONI SHAMALA,
KELVIN MUKALA SHAMALLA,
ELINE AYUMA SHAMALLA,
ROBERT MWINZI MWENZWA,
VERONICA NGINA MWINZI,
DENNIS MWENDWA MWINZI,
JOHN MAMBO MWINZI,
JULIUS MULE MWENZWA,
ROGERS MAKAU MUTUA,
CATHERINE NDUNGE NTHENGE,
PATRICK KULENYWA MASHETI,
GETRUDE AYUMA SHIKHUYU,
THE ESTATE OF CHARLES
MASHETI MWANI,

**THE ESTATE OF ANGELINA
MUCHITI MASHETI,

LEWIS MASHETI KULENYWA,

EDWIN ANDOLE KULENYWA,

AGRIPINA SHITAKWA IKATWA,

THE ESTATE OF JOHN ABUNG'ANA
MASHETI,

MALACHI ONYANGO OKUMU,

PHOEBE ATIENO ONYANGO,

MIKE SPENCER OLUOCH,

CHRISTOPHER WAFULA WAKOLI,

CATHERINE NAFULA NAMASAKA,

DAISY LILIAN WAKOLI,

ANDREW WAMALWA MAUBE,

SABINA NAKHUMICHA
RAYIMONDI,

ABRAHAM MUKHWANA MAUBE,

JOSEPHAT WAWIRE MANYASI,

FRANCIS VINCENT MOSETI,

JANE AMBOGO KADAJI,

ARAFAT NYAMBEGA MOSETI,

LYDIA MORAA MOSETI,

JOHN OBIRI KINARO,

SUSANA KERUBO OBIRI,

GEOFFREY MOGENDI OBIRI,

OBADIAH OMEKE OBIRI,

GABRIEL OWUOR ORODI,

PAMELA ANYANGO,**

SERFINA ATIENO OSIRI,
SIPRINA ADHIAMBO OBORA,
CONSOLATA ATIENO OLANDO,
MONIKA ANYANGO JUMA,
MOSES MAITHYA MULI,
KATUI MAITHYA MULI,
FRANCIS MUTUKU MAITHYA,
SAMUEL MUTUA MAITHYA,
PHILIP KITONGA MAITHYA,
AGNES SYOMBUA MAITHYA,
RHODA MWENDE MUSYOKA,
TELESIA NDANU MAITHYA,
RACHAEL MUENI NZOKA,
MWINZI MULI MUSILA,
PETER MULI MUSILA,
MUSYOKA NYAMBA,
THE ESTATE OF SYLVANUS
MUGURU ISINDU,
BRENDA NIGHT WANDERA,
ADILAQWEEN MASITSA ISINDU,
BENJAMIN SHITSUKANE
YAKHAMA,
ENOCK NYAGAKA ONTINTA,
GLADYS NYAMBEKI OTOKI,
THE ESTATE OF PETER ONTITA
SONG'ORO,
JEMIMA NYAMBATI ONTITA,
ELKANA JOHN MOSES ONTITA,

STEPHENE ONSERIO ONTITA,
RODAH NYASUGUTA ONTITA,
SARAH NYABOKE ONTITA,
STANLEY OKEMWA ONTITA,
DORCAS N. TINEGA,
NDAMBU KOKO,
PENNINAH SYOMBUA NDAMBU,
KOLI KOKO,
JOYCE SYONZI NDAMBU,
ALFRED MWALOZI TINGA,
PHILIP NZUKA KALUNDU,
COLLETA KAVUTHA MWENDWA,
FRANCIS MAKARIO GISEMBA,
MULWA SAMMY,
JUSTUS MUTUA MULI,
CHARLES FRANCIS MANGARE
MEROKA,
PACIFICA MEROKA KIMWOMI,
DANIEL MEROKA KIMWOMI,
ALEX OMONDI KIMWOMI,
AMOS OMAYO KIMWOMI,
RUTH MOKEIRA KIMWOMI,
ANNAH BIKORO KIMWOMI,
JOAN MORAA KIMWOMI,
IBRAHIM SALIM MEROKA,
SAMUEL MWENCHACHA MEROKA,

**THE ESTATE OF THOMAS KARANI
MEROKA,**

JOSEPHAT BUTICHI MAKAMU,

LUCY KHADESA MAKAMU,

FELISTER SHALIBA MAKAMU,

KALELE MATHUKU,

MUANDIKWA MATHUKU,

JOSIAH LIKABO CHISIENYA,

PHANICE SHAKWI KHAIMBA,

LILIAN LIKABO,

FRANKLINE LIKABO,

CHACHA JAMES MWITA,

**THE ESTATE OF SERAH CHIZI
CHIFALLU,**

MARY KADZO CHIFALLU,

BEATRICE DELINA CHIFALLU,

ANDREW CHIFALLU,

JONATHAN NDUNE CHIFALLU,

**THE ESTATE OF DANIEL
LAWRENCE CHIFALU,**

CATHERINE LUVUNO,

FRANCIS OKOTH OKUKU,

ALFRED KHALISIA MBASILU,

DANIEL WAFULA WANYONYI,

HUDSON MALONGO MAKWANA,

FAMUS MUSIMBI MUYOMA,

BROWN NGAIRO AGUYA,

JAMES MWATHE MWANDAI,

MARTIN WANJALA KONGE,
THE ESTATE OF BRIGID NASIMIYU
WEKESA,
JOSEPH OKOTH OGONDA,
OKOTH DANCUN,
OCHIENG' DAVID OKOTH,
MOKAYA OMWENGA,
DUNCAN OGERO MOKAYA,
HUMPHREY MOGUSU MOKAYA,
DANIEL WAMBUA MWASYA,
CHRISTOPHER MWANGANGI
MWASYA,
CAXTON NGEI MWASYA,
MUTISO MWASYA,
ATHARONY NABISWA SINGAPATI,
AGGREY ANINGU OBWAMU,
BENSON GICHUNUKU NABEA,
THE ESTATE OF PAUL KIMAIYO
KIBIEGO,
VERONICA JEPKOSGEI KIMAIYO,
LINUS KIMWETICH KIMAIYO,
JANET KIMAIYO.,
MARTIN KIPYEGO,
BARNABA KOSGEI KIBIEGO,
FLOMENA JEPCHIRCHIR KIPYEGO,
FAITH CHEBIWOT KIMAIYO,
JOSEPH AMUGUNE IMBUKA,
MARTHA SITOKO IMBUKA,

JOSEPH IMBUKA H A,
RASUA KENDA IMBUKA,
ROSE VUGUTSA AMUGUNE,
EVERLYNE MWANIGA AMUGUNE,
BENSON MWANGI AMUGUNE,
VICTOR KEVERENGGE AMUGUNE,
BENARD IGNEA JUMA OSODO,
MICHAEL MUKWEKWE MATHUKU,
KATUKU MUKWEKWE,
NZAMBU MUKWEKWE,
BONIFACE MULWA KYANGA,
PETER MWANDIKWA MUTHUI,
MARTIN ODHIAMBO GUMBO,
AGNES ACHIENG ODHIAMBO,
TITUS ONYANGO ODHIAMBO,
JOSEPHAT LAWI ODHIAMBO,
DAVID MUTISO KILONZO,
JOSEPHINE MUTANU MALELU,
AURELIA MUKENE MUTISO,
CYRUS SILA KILONZO,
RUTH MUSENGYA MUSYOKA,
GREGORY WAMBUA KILONZO,
FRANCISCA MUTHOKI MUSYOKA,
NGUI MUSILI,
SCOLASTICAH NGINA NGUI,
ESTHER MAWIA NGUI,

SILAS NYONGESA MUSIRO,
SELESTINE MACHUMA WANYAMA,
PIUS KHAMALA MUSIRO,
MISA NEKESA KHAMALA,
STELLAH WEKESA NYONGESA,
DISMAS MASIKA PIUS,
ELIUD WAFULA PIUS,
DAVID WAMBULWA MUSIRO,
DOUGLAS MUKHEBI KHAMALA,
MATHEW WANJALA KHAMALA,
DANIEL SIMIYU MUSIRO,
JUDITH NANJALA NYONGESA,
MARY NEKESA KHAMALA,
JULIUS KIPCHIRCHIR NG'ENO,
DIANAH NGENO,
GEORGE OKWERO MAGERO,
MICHAEL OTIENO OUMO,
DANIEL MUNYAO KISOVI,
WANZA MUNYAO KISOVI,
DANIEL KISOVI, REPRESENTATIVE
OF THE ESTATE OF NDUNGWA
KISOVI,
ONESMUS KISOVI,
BENJAMIN KISOVI,
MONICA RISPA NYABUNDI,
ENID ANYANGO NYABUNDI,
KARL WILSON NYABUNDI,

JOHN NJOGU GICHU,
ROSE WANGUI NJOGU,
JANE WAIRIMU NJOGU,
RACHAEL WATIRI NJOGU,
SAMUEL GICHU NJOGU,
JOSEPH MUTUA KIVAI,
REPRESENTATIVE OF THE ESTATE
OF SAMMY KINGOO KIVAI,
THE ESTATE OF KIVAI KILONZO
MILO,
MARY NDINDA KIVAI,
JOSEPH MUTUA KIVAI,
MUTINDA MUUMBO MWANIKI,
MARIA KATWA,
KELVIN MUMBO,
LILIAN WANZA MUTINDA,
MESHAK MUSILA,
EDWARD ONYANGO OPYIO,
RUTH ATIENO AYIEKO,
FRANKLINE OCHIENG ONYANGO,
MONICA AWUOR ONYANGO,
MARY WINFREY AOKO ONYANGO,
SAMSON OTIENO,
THE ESTATE OF FRANCIS NJOKA
NZIKALI [DECEASED],
MUTUO NZOKA NZIKALI,
BONFACE VUNDI NZOKA,
NZIKALI MUVENGEI NZOKA,

**SHADRACK MUSEE NZOKA,
SAMMY KATHOKA NZOKA,
DICKSON KILILI NZOKA,
GABRIEL MWANIKI NZOKA,
JOSPHINE KIVIVYA NZOKA,
AKINYI NZOKA NZIKALI,
KIVIVYA NZOKA ,
JOHN ODERA NJOKA,
JOHN KALOKI SAMMY,
JANE NDUKU KALOKI,
STEPHEN MWENDWA KALOKI,
LUCY MWENDE,
JAMES WATITI SOITA,
GLADYS MORAA MOGAKA,
THE ESTATE OF RICHARD
MAITHYA MUTUA,
JUDINAH MUKAI MAITHYA,
THOMAS KWOBYA MUTUA,
HUDSON ASWANI LOVONI,
DICKSON KAGONI OTWERE,
FLORENCE MALESI LUSESO,
DERICK NDOROVO KAGONA,
BONFACE LIDAYWA OTWERE,
DISHON KAHERIA GAKURU,
RUTH WANJIRU KAMAU,
GAKURU DISHON KAHARIA,
JAMES GAKURU KAHERIA,**

ALICE NJOKI GAKURU,
CHARLES MWANGI GAKURA,
SAMUEL MWINGA JAMES,
THE ESTATE OF MWEMA
MUNGUTI,
MUENI MUEMA,
FRANCIS MUEMA,
BENRODGERS SAFARI MUEMA,
MWANZIA MUEMA,
MUSYIMI MUEMA,
JESSICAH NDUKU MUEMA,
EVALYNE KAMBUA JOSEPH,
ZIPPORAH KANINI MUEMA,
JOSEPH MUTAVI NDETO,
BIBIAN KATOLE MUTAVI,
STEPHEN MUSEMBI MUTAVI,
JACINTA NZISA MUTAVI,
CATHERINE SYOWIA MUTAVI,
BENENDICTO AMKAKA IKOHA,
VINCENT SEKO IKOHA,
PETER KIMOTHU WACHIRA,
TERESIA WANJIKU WAITATHU,
SILAS WACHIRA KIMOTHU,
JOSEPH WAITATHU KIMOTHU,
ANTHONY WANJALA WAMALWA,
DISMAS WAMALWA WEKESA,
ROSE NASIMIYU WAMALWA,

LINUS WAFULA WESONGA,
JOSEPH OTIENO ABWAO,
NICODEMUS MUKABANA
INYANGALA,
DORAH ATIENO OKOTH,
ARTHUR YESWA,
MELISA SARA MUTOKAA,
LILIAN KARUNGI MUTOKA,
GEOFFREY KHAYUMBI MUTOKAA,
LINAH KHAYELI MUTOKA,
TIMOTHY MAKOKHA MUTOKAA,
JOSEPHINE KHASANDI MUTUKA,
NANCY MUKHWANA MUTOKA,
CHARLES ORINA MACHANI,
ANDRINE MUTHONI MWANGI,
PARTICIAH NDUTA ORINA,
DENIS GEKONGE MACHANI,
THADDEUS BICHAGE MACHANI,
JEFFERSON MAYAKA MOSETI,
DIVINAH MOKEIRA MAYAKA,
SAMUEL MOSETI JEFFERSON,
JANE NJERI JIMMY,
SAMUEL NDIHO,
FANUEL MAKOKHA FORTI,
JACOB ANJECHE JOTHAM,
PROTAS LIKHANGA MUSONYE,
JOSEPHAT KONZOLO BITINYU,

CLARIET AKINYI OKWIRI,
DANSTONE NAMBILLI KONZOLO,
PIUS LUNDO MUSYOKA,
ANDREW NYANGAU ASANDE,
FANUEL RUDIEMA KIVAILU,
KENNETH KIGURU KARONGO,
THE ESTATE OF LILIAN WAITHIRA
KARONGO,
KAMAU KARONGO GN,
RUTH GACUKI KARONGO,
WINNIE GATHONI KARONGO,
STEPHEN MUNGA KARONGO,
JOYCE WANJIRU MUTIE,
RACHAEL WANJIKU KARONGO,
HELLEN MUNGARI KARONGO,
RICHARD SHIJENJE MUCHEYWA,
ARBANUS LUSENTO MUCHEYWA,
STEPHEN MUSYOKA NDELE,
CRISPUS SHILAHU ISOHE,
AMLHA M. MURWA,
FRIDAH M. BARNET,
DEREK ISOHE SHILAHU,
DIANA ACHITSA SHILAHU,
NELSON IDEVEDE ISOHE,
SILAS ASIEVERA ISOHE,
GABRIEL MUSOGA ISOHE,
MARY LLEGA ISOHE,

ALFAYO SHITOTE MALESI,
THE ESTATE OF MUNYOKI
NDUNGU ,
JOSEPHINE NGUNO MUNYWOKI,
NZILU NDUNGU MULULU,
DANIEL MWEMA MUNYOKI,
BENJAMIN MWANDIKWA
MUNYOKI,
BEATRICE MWIKALI MUNYOKI,
GLADYS MUSANGI MULI,
VICTORIA MWENDE MUNYOKI,
JACKSON ONYIEGO NYABOGA,
JAPHETH NDOLA KITILI,
THE ESTATE OF PATRICK MUANGE
KITHUKU,
COLLETA KAVATA MUANGE,
ELIZABETH MWELU MUANGE,
ERASTUS RITHO GACHUCHE,
AMOS GACHUCHE RITHO,
JOSEPH NYAKUNDI NYARWABA,
MWENDWA KITHATU,
LAELI KANINI MWENDWA,
SILAS MUI MWENDWA,
ONYWERE EVANS NYARIKI
ONDARI,
THE ESTATE OF ONDARI NORWANI,
BENJAMIN MUSILI MUTEML,
THE ESTATE OF JOHN GACHARA
KIGOTHU,

FESTUS GACHANJA MWANGI,
MUTUVYA JAMES NJOROGI,
JOHN WERU KIRURI,
JOHN WERU KIRURI,
MARY WERU,
THE ESTATE OF JAMES KIRURI
WERU,
THE ESTATE OF JOYCE NJERI
KIRURI,
ROCKY WERU KIRURI,
JOYCE NJERI WERU,
LUCY WANJIRU WERU,
PATRICK TANA,
WASHINGTON KIGANI
MUKANGULA,
ANNE KAGEHA KIGANI,
PROTAS MAKHETI MAKOKHA,
JOSEPH MWILITSA KASALI,
BENEDICT MALUKI MUSEE,
JAMES OMANWA,
RUTH MORAA KINANGA,
JOSEPH YUYA ABUKU,
ARGWINGS ONYANGO,
BONIFACE KIVUVA MUTUNGI,
ADAN OLOW KASSIM,
KURESHA FARAH HASSAN,
DAVID MAKAU MWANZA,
SYOMBUA MWANZA MBAKU,

ERASTUS MUTHUSI MWANZA,
DICKSON MUSYOKA MWANZA,
AMON KITOI KAAYA,
ANOLD AMON KAAYA,
TITUS NGUI MUSILI,
IDDI SALEHE ZIKO,
KHADIJA SAID AMRI,
SALEHE IDDI ZIKO,
HAMISI IDDY SALEHE,
PHILIP OMWENGA MOSOTI,
THE ESTATE OF EPIMACK STEVEN
MKUNKULA ,
JANE GERALD MKUNKULA,
KAMILA EPIMACK MKUNKULA,
VERONICA EPIMACK MKUNKULA,
KITHIKII WAMBUA,
MWIKALI KITHIKII,
THE ESTATE OF ALMASI JAFARI ,
SIFA JUMA MSATU,
ALMASI ALMASI JAFARI,
CHAGOS ALLY ALMASI,
HAFSA ALMASI JAFFARR,
HAJRA ALMASI JAFARI,
SAKINA ALMASI JAFFARI,
ABDALLAH JUMA MLILAPI,
ABDALLAH ADAM TAMATAMA,
SAID HASSAN MAKAU,

**DEUS CELESTINE NDAGALA,
THEODORA ISHERWIGA KALWANI,
MARIAGORET DEUS NDAGARA,
SEMIYONO MOHAMED ODER ,
RAMADHANI MOHAMED ODA,
RASHID JUMA MAULID,
ASHA RASHID MAULID,
DAVID EDWINS MNALAU,
TIBERY AJWERA OOKO,
PETER OPIYO AJWERA,
BENARD OJJA OOKO,
DENIS OKINYI OOKO,
AZIZ JUMA HAMIDU,
MWANAISHA SAID RASHID,
ABDULSWALEH JUMA HAMIDU,
BENARD KYENGO KAWEA,
EVERLYNE ATIENO SHIKUMO,
MARGRET MWIKALI KAWEA,
RICHARD MBITHI KAWEA,
PATRICIA MUENI KAWEA,
JERALDINE NDINDA FRANCIS,
STANLEY MECHA MATARA,
MATHEWS KIPNGETICH KOSKEI,
HELLEN JEPTOO KEMBOI,
ROBERT MUTUKU NDAVI,
PERPETUA MONA MULINGE,**

VICTORIA KATUNGE ROBERT,
NAOMI NZILANI ROBERT,
ROSE NDAVI,
DONALD MULWA MULATYA,
MWENDE MULWA,
ZAKAYO KAVIVYA MULWA,
GLORIA MAWIA MULWA,
PAUL MUSEMBI MULATYA,
JAMES EDWIN OWUOR,
MARY AKINYI OYIRO,
CHARLES JUMA,
FRANCIS MUTEMI MAILU,
JOSEPH MUTHUI KATULA,
PROTAS BARITORE GEKURA,
MUNGATU KASIVI,
CHRISYSTEM ONARATI TUNDULI,
FRIDAH NANJALA KHAEMBA ,
RONALD LAWRENCE ALYUBA,
STEPHEN MAITHYA,
THE ESTATE OF AMOS MAITHYA,
THE ESTATE OF LAMECK KAKUNDI
MAITHYA,
HASSAN MOHAMOUD ALI,
ZULEKYA MOHAMED ALI,
AYAN MOHAMOUD ALI,
HENRY NYABUTO MOGENI,
JANE KEMUNTO NYABUTO,

BISMARK NYAKUDI NYABUTO,
BEDIAH NYABOKE NYABUTO,
WYCLIFF ONCHOKA NYABUTO,
IAN NYAKORA NYABUTO,
MORIS ORINA EVANS,
PETER MWAIWA MWINZI,
THE ESTATE OF SAMUEL MBAJA
GWESO,
TAPHRONDHA KARAH MBAJA,
NICHOLAS OKODE MBAJA,
LUCY KAVUTSI MBAJA,
SINAIDA KEDOGO MBAJA,
PATRICK SAGWA KADUKHA ,
VIOLET KADENGE CHUNZA,
EGNICIOUS AMWOGA SAGWA,
JACKSON KHAYEGA SAKWA,
DANIEL NDUVA KATUMO,
GIDEON OMONDI MULONGA,
JUDITH ATIENO OMONDI,
DAVID OLUOCH OMONDI,
SILA KIVUVA,
JOYCE MWENDE SILA,
MONICAH MWETHYA KIVUVA,
RUTH MUTHEU SILA,
JOSHUA MWAKA SILA,
ANNE KAVUTHA SILA,
JONATHAN KYALO KIVUVA,

JOSPHINE MUNYIVA CHIMANO,
SHADRACK KILONZO NGIRO,
JOYCE MWENDE KILONZI,
JOB WAMBUA KILONZI,
MUKAVI KING'ANG'I,
PATRICIA NDUKU MBITHI,
CYRUS KING'ANG'I MUKAVI,
CYRUS SILA KINGANGI,
SAMUEL KIMANI WALLACE,
MARY WANJIKU KIMANI,
SARAH NJAMBI WAWERU,
FLORA WAITHERERO KIMANI,
SERAH NJAMBI KIMANI,
JACKSON NG'ANG'A WAWWERU,
JOYCE WAIRIMU GICHAMBA,
LOYCE NJERI NAMAYANI,
WILFRED GICHAMBA WAWERU,
THE ESTATE OF STEPHEN GICHUHI
WAWERU,
LEAH WANJA WAWERU,
SUSAN WANJIRU WAWERU,
THE ESTATE OF MARY WANGARI
WAWERU,
THE ESTATE OF STEPHEN GICHUHI
WAWERU,
WYCLIFFE LIBOYI,
CHRISTINE INDONOLA,

**WYCLIFFE LIBOYI,
REPRESENTATIVE OF THE ESTATE
OF JANE LIBOYI,**

LAVENDER WECHE,

PAMELA SHIOKO WECHE LIBOYI,

GILBERT NZOMO MUTUNGA,

RACHAEL NDANU NZOMO,

**THE ESTATE OF NDUSYA
MUTUNGA MUKUSYA,**

BENJAMIN MUSYA,

JACOB WAMBUA NZOMO,

MULINGE NZOMO,

DANIEL MWENDWA NZOMO,

KATUI MUTHAMI NGELE,

MUSYOKA MUTUNGA,

PETER MUNYOKI MUTUNGA,

MUTEMI MUTUNGA MUKUSYA,

EVANS KEBIRO OMAE,

**THE ESTATE OF JACKLINE
KWAMBOKA,**

PERIS KEMUNTO OMAE,

STEPHEN WALWE SHEM,

BIBIANA KHALEKI BARASA,

MAUREEN NAMULANDA WALWE,

JULIET NAFULA WALWE,

SHEM WALWE KEVIN,

VICTOR NYONGESA WALWE,

**PHILEMON SAMUEL BALA
ODHIAMBO,**

JAMES MUGAILWA KASIVWA,
CATHERINE NYAMBURA,
ANNE WAIRIMU CHEGE,
MALCOM CHEGE,
MARIE ELLEN NJAMBI,
ANTONY THIONG'O CHEGE,
BENNY MESHUVAM MURUKIA,
HARRISON OSUNDWA OTACHI,
JAMES OTACHI OSUNDWA,
LIVINGSTONE MAINA NDONGA,
JENEFFER WANJIRU MAINA,
GRACE WANJIRU NDONGA,
FREDRICK NDONGA MAINA,
GEORGE NDIRITU NDONGA,
JOSPHINE NYAMBURA NDONGA,
ESTHER NJERI NDONGA,
RODERICK PIUS KAUNDA OKARI,
LYDIA MBATHA NDIKU,
ESTHER MORAA NYAMBEU,
THE ESTATE OF SIBIAH MONG'INA
OKARI,
MOFFAT OKARI KAUNDA,
MAUREEN BOSIBORI OBIERO,
CHRISTOPHER MAGATI OTERO,
NYANCHAMA OKARI.,
PENINAH BITENGO NYAMURO,
DARIUS ORENGE OKARI,

TIBELIUS ORENGE OKARI,
FRED MACHOGU OKARI,
CHRISTINE KEMUNTO OKARI,
NYACHOTI OKARI,
LEVI KHAEMBA,
SITATI NASIMIYU JANEPHER,
KAREN NASUMBU SIMIYU,
SAMUEL NAKITARE KHAEMBA,
CHARLES KUSUCHA KHAEMBA,
JOSHUA MARAKA KHAEMA,
JOSEPHAT LIKWILO KHAEMBA,
AMINA MOHAMED HAJI,
THE ESTATE OF MOHAMED
MOHAMED HAJI,
THE ESTATE OF FATUMA ISSA,
ISA PAUL MOHAMED,
NATASHA MOHAMED ILAKO,
SYLIVESTER OUMA SULWE,
TIMOTHY JUMA SOKONI,
ALLAN KHAOYA WANANDABA,
THE ESTATE OF PETER KINYANJUI
NJOROGE,
NANCY WANGUI MUYA,
FRANCIS ONGWAE NYAKUNDI,
WANYONYI JONATHAN NYIKURI,
DANIEL MOKAYA TORORI,
STANLEY NG'ANG'A MUHIA,

ANDREW MUTISO MATHUKU,
KISIANGANI WANGILA WALIAULA,
ERICK OCHIENG AJWANG,
JULIUS KISANGAU NZALU,
THE ESTATE OF VERONICA
KAVINYA JULIUS,
PRISCA MUTHEU KISANGAU,
ALEXANDER MUKUL KATAMBU,
SUSANA NDUNI MUKUI,
KYAMBI KATAMBU KIMALI,
JAMES MUSYA MUKUI,
JOSHUA KATAMBU MUKUI,
TITUS MUTISYA MUKUI,
ELIJAH MUVEA MUKUI,
MARY NDUNI MUTUKU,
SAMUEL MBUVI KATAMBU,
AMOS KIRURI MAINA,
FREDRICK ODHIAMBO ORIA,
JOHN KIBAARA NDUBAI,
KUNGU SAMSON BARAZA,
JOHN SHONDO KARANI,
FRANCIS MUGAMBI NDUBAI,
TITUS MUSILI MWINZI,
ANNAH NDUMI MUSILI,
WILSON MWINZI MUTHUVI,
TIMOTHY MWENDWA MWINZI,
THOMAS KIPTOO,

**FLORENCE ESENDI KIVUMBI,
ALFRED KIPKOSKEI KEMEI,
KELVIN TOO,
JUDITH CHEPCHUMBA TOO,
DINAH CHERONO LETING,
JOAB Khabochi Amanya,
BEATRICE MARAKA SOROBEA,
VICTOR AMANYA KHABUCHI,
CELESTINE KHALENYA,
BRILIAN NANGO'OLI,
ECLAY KHAMUYE,
SIMON BAHATI LICHESHI,
THE ESTATE OF WINSTON KUNDU
SIANGU,
BEATRICE NAFULA KUNDU,
FIONA NEKESA SIANGU,
SUSAN NAKHUNGU SIANGU,
ANTONY MUTAKHA IMONJE,
BEATRICE AMBUSO OKALILE,
CHRISTINE MUNANI ASEKA,
EVANS VISIA LIYENGWA,
ISAIAH MUSYOKA KAVILA,
STEPHEN MUTUNDA,
REPRESENTATIVE OF THE ESTATE
OF CHRISTINA MUKUNGI,
STEPHEN MUTUNDA,
REPRESENTATIVE OF THE ESTATE
OF FRANCIS KAKULI MUTUNGA,
ERIC MUTISYA KILONZO,**

YVONNE MUKINA KILONZO,
JOYCE MBATA MULANDI,
PAMELA GWIYANCHI BOGE,
THE ESTATE OF ALFRED
MULABWA,
MARGARET MULABWA,
PATRICIA MARAKA,
DERICK INDULI,
SHIRLEEN ILUSA,
JOHNSTONE MULABWA,
AGATHA MULABWA,
STEVEN MULABWA,
PETRONILA KHAMBSI,
EMELDA MULABWA,
GREGORY MULABWA,
POLYCARP MULWABWA,
CHRISTOPHER MITUNGU NAMAYI,
THE ESTATE OF MEROKA MITIEKA,
THE ESTATE OF KEMUNTO
MAKINYA,
RUTH NYAWIRA NJOGU ,
MONICAH KALUMU,
OSCAR MWANGANGI LUNDO,
FRANCISCAR SYOMBUA LUNDO,
LILIAN MUETWA LUNDO,
SYLVESTER MUSEE LUNDO,
VINCENT MUINDE LUNDO,

CAROLINE KUTHEA LUNDO,
NAOMI MUMO NDELE,
NATASHA NDELE,
SHAWN NDELE,
MARY MASITSA,
MOHAMOUD ALI MOHAMED,
REPRESENTATIVE OF THE ESTATE
OF NIMO HASSAN ALI,
MOHAMOUD ALI,
REPRESENTATIVE OF THE ESTATE
OF MOHAMOUD ALI MOHAMED,
ELIZABETH MKALA ALPHOURE,
PETER PATRICK MKALA,
RAPHAEL MKALA,
KAROLI MKALA,
VERERANDE MKALA,
BLANDINA MKALA,
THE ESTATE OF JOYCE PETER
LUYEKU,
RUTH OMBEVA, and
EDITH MUHONJA,

Plaintiffs,

v.

THE ISLAMIC EMIRATE OF
AFGHANISTAN
C/O ABDUL GHANI BARADAR
TALIBAN POLITICAL OFFICE
DOHA, QATAR,

THE TALIBAN
C/O ABDUL GHANI BARADAR
TALIBAN POLITICAL OFFICE
DOHA, QATAR,

**THE HAQQANI NETWORK
SIRAJUDDIN HAQQANI
NASIRUDDIN HAQQANI
C/O ABDUL GHANI BARADAR
TALIBAN POLITICAL OFFICE
DOHA, QATAR,**

AL-QAEDA, and

**DA AFGHANISTAN BANK
IBNI-SINA WATT
KABUL, AFGHANISTAN**

Defendants.

COMPLAINT

Plaintiffs, through undersigned counsel, respectfully bring this action against The Islamic Emirate of Afghanistan, The Taliban, The Haqqani Network, Al-Qaeda, and Da Afghanistan Bank, and allege as follows:

I. Introduction.

1. On August 7, 1998, the designated Foreign Terrorist Organization (“FTO”) al-Qaeda, (“AQ”) perpetrated near simultaneous bombings of the United States Embassies in Nairobi, Kenya, and Dar es Salaam, Tanzania (the “Terrorist Attacks”), killing 224 civilians and injuring over 5,000, including the Plaintiffs.

2. The United States District Court for the District of Columbia (“D.D.C.”) found the Republic of Sudan (“Sudan”), the Islamic Republic of Iran (“Iran”), the Islamic Republic Guard Corps (“IRGC”) and others aided and abetted directly, and indirectly (via FTO Hizballah), AQ in perpetrating the Terrorist Attacks. See. *Wamai, et al., v Republic of Sudan, et al.*, No. 1:08-cv-1349; *Amduso, et al., v Republic of Sudan, et al.*, No. 1:08-cv-1361; *Onsongo, et al., v Republic of Sudan, et al.*, No. 1:08-cv-1380; *Opati, et al., v Republic of Sudan, et al.*, No. 1:12-cv-1224.

3. Prior to filing the lawsuits against Sudan and Iran, the United States and coalition forces invaded Afghanistan in retaliation for the attacks on the United States on September 11, 2001, and vanquished AQ, the Taliban and the Haqqani Network (“HQN”) from Afghanistan, leading to the formation of a new Afghani government unconnected to the Taliban, AQ or HQN.

4. AQ, HQN forces and the Taliban fled Afghanistan across the border to North Waziristan, in the Federally Administrated Tribal Areas of Pakistan (“FATA”), generally outside the control of the Pakistani government and under the control and protection of HQN. Thereupon relocating the government of the Taliban controlled, Emirate of Afghanistan, to a safe harbor provided by HQN in the Miram Shah, North Waziristan Region, Pakistan and/or Quetta, Balochistan, Pakistan.

5. In 2005, the Pakistan Taliban was formed under the leadership of former HQN/Taliban military commander Baitullah Mehsud, called Tehrik-i-Paristan (“TTP”), with the support of HQN and AQ.

6. The Defendants entered into a joint criminal conspiracy to attack and kill U.S. citizens, and employees and contractors of the U.S. government wherever located, and specifically jointly perpetrated, together with others, the suicide bombings of the United States embassies in Nairobi, Kenya and Dar es Salaam, Tanzania.

7. The HQN is an FTO and is considered by the Combating Terrorism Center in West Point to be the “*fountainhead of jihad/global jihad.*”

8. HQN was founded by Jalaluddin Haqqani, in 1973, to conduct jihad against the secular regime in Afghanistan, and over time, has expanded its operations to initiate, support, conduct and incite jihad on a global basis, primarily against the United States and its allies.

II. Jurisdiction and Venue

9. This Court has subject matter jurisdiction under 28 U.S.C. § 1331, because Plaintiffs bring claims under the Anti-Terrorism Act, 18 U.S.C. § 2333 (hereinafter referred to as the “ATA”), and it further has jurisdiction over Plaintiffs’ claims under the Alien Tort Statute, 28 U.S.C. § 1350 (hereinafter referred to as the “ATS”). The United States District Court for the District of Columbia held that the bombings of the United States embassies in Nairobi and Dar es Salaam “touched and concerned” the United States with sufficient force to displace the presumption against extraterritorial application of the ATS. *Mwani v. Bin Laden and AQ*, 1:22-cv-00125-JMF (D.D.C. May 29, 2013).

10. The Court has pendent jurisdiction over Plaintiffs’ state-law claims, which arise from the same nucleus of operative facts as Plaintiffs’ federal-law claims under 28 U.S.C. § 1367(a). See *IUE AFL-CIO Pension Fund v. Herrmann*, 9 F.3d 1049, 1056 (2d Cir. 1993). The laws of the District of Columbia should be chosen as the law for pendent state-law claims. See *Owens v. Republic of Sudan*, 826 F. Supp. 2d 128 (D.D.C. 2011).

11. Separately, the Court has diversity jurisdiction over Plaintiffs’ state law claims under 28 U.S.C. § 1332 because the Plaintiffs and Defendant are residents of different domestic and foreign states, and the amount in controversy exceeds \$75,000.

12. Because the embassy bombings occurred at the United States embassies in Kenya and Tanzania, and Defendants HQN, Taliban, Islamic Emirate of Afghanistan, Da Afghanistan Bank, and AQ are foreign defendants, venue is proper under 28 U.S.C. § 1391(b)(3).

III. Parties

A. Plaintiffs

13. Plaintiff PRUDENCE BUSHNELL was the United States Ambassador to Kenya at the time of the terrorist bombing of the U.S. Embassy in Nairobi, Kenya. She is a citizen of the

United States and was injured in this attack. Plaintiff brings this action in her own right for her personal injury, loss of society and severe emotional distress.

14. Each of the other named Plaintiffs is either a United States citizen or a foreign national employee or contractor of the United States Government who were injured or killed in the 1998 embassy bombings, or an immediate family member of those victims. They suffered severe and substantial physical and emotional injuries with lasting and permanent effects—or death—as a result of these attacks.

15. Plaintiffs bring their claims against the Taliban under the Anti-Terrorism Act, Alien Tort Statute, and state tort law. They seek compensatory and punitive damages, interest, fees, and costs for their injuries. Hundreds of these Plaintiffs are currently judgment holders against The Islamic Republic of Iran and other agencies of its government for their role in the same attacks at issue here. Those who are not already judgment holders have filed or are preparing to file suit against those Iranian parties in the District of Columbia.

B. Defendants

1. Defendant HQN

16. The HQN was formed in 1973 by Jalaluddin Haqqani (“Jalaluddin. The HQN is an Afghan and Pakistani insurgent group whose senior leadership structure is hierarchical and mostly familial in nature. Major familial leaders include the founder Jalaluddin Haqqani and his brother Khalil Haqqani, as well as Jamaluddin’s sons Badruddin, Nasiruddin and Sirajuddin.

17. Jalaluddin was born in 1939 in the village of Karezgay in the Zadran District of Paktia Province, Afghanistan. He was an ethnic Pashtun from the Zadran tribe of Khost. Jalaluddin attended the prestigious Islamic seminary (madrassa) Dar al-Ulum Haqqaniyya at Akhora Khattak, in Pakistan from 1964-1973, attaining certification as a Mawlawi (Islamic scholar). The Haqqaniya is a Deobandi madrassa which combined religious studies with urging students

(“*talibs*”) to conduct violent jihad against perceived enemies of Islam. The majority of the leadership of the Taliban and of the HQN are graduates of this institution.

18. Jalaluddin adopted the radical religious teachings and curriculum of Haqqaniya, which combined training for, and committing violent jihad, with extremist, anti-colonial Deobandi religious teachings in establishing over 80 madrassas in the Pakistani tribal areas in the 1970s-1980s. These madrassas were intended to serve as, and in fact became, mass recruiting stations of mujahidin (“holy warriors”) to conduct jihad under the leadership of the HQN, AQ and later the Taliban.

19. Immediately following the July 17, 1973, coup led by the Prime Minister, General Sardar Mohammed Daoud Khan, Jalaluddin declared a violent jihad, with the goal of ridding Afghanistan of the “progressive” (secular) influences under the new autocratic regime and restoring traditional Islamic law and culture.

20. Jalaluddin established the Rahimiyya madrassa modeled after the Haqqaniya madrassa in the Patika Province of Afghanistan, and eventually established over 80 other madrassas in Pashtun tribal villages on both sides of the disputed international border (called the Durand Line) between Afghanistan and Pakistan. These madrassas played a key role in spreading his jihadist worldview and served as indoctrination and recruitment centers for tens of thousands of students (*talibs*) to enter military training camps set up by the Haqqanis and join the violent jihad.

21. Unlike other Afghan jihadi groups at the time, the Haqqanis built a network of tribal support, because they were the only group based upon Islam and jihadi Islamic teaching, instead of based upon tribal association. This was the initial formation of the HQN.

22. Pakistani military intelligence, Inter-Services Intelligence (“ISI”), provided funding, training, weapons and safe harbor for HQN and in exchange, HQN supplied mujaheddin for ISI led terrorist attacks across the disputed border with India in the Kashmir province.

23. In 1978, Mawlawi Hanif Shah, a junior classmate of Jalaluddin's at the Haqqaniya madrassa and an early supporter of the mid-1970s uprisings in Paktia, was sent to Saudi Arabia for two years to establish a network of funding and support for HQN. Mawlawi 'Aziz Khan, later the director of HQN's Manba' al-'Uloom madrassa in Miranshah, was also sent around this time "along with a few other brothers ... to the Gulf to promote the cause of the Afghan jihad there." Unlike other Afghan commanders, Jalaluddin's early outreach to the Gulf was not limited to seeking financial contributions. Haqqani fronts were especially unique in their early and consistent willingness to accept Arabs seeking battlefield participation, and Haqqani-dominated Loya Paktia was the single most common destination for the Arabs who went beyond Peshawar in the 1980s.

24. Documents taken from HQN compounds in early 2002 provide evidence that the network historically relied on the ISI for cash, weapons, training and virtually all supplies during the early 1990s. Former Joint Chiefs of Staff Chairman Admiral Mike Mullen testified before the U.S. Senate that the HQN acts as a "veritable arm" of the ISI.¹

25. After the 1979 Soviet invasion of Afghanistan, Jalaluddin emerged as a prominent commander in the mujahidin resistance movement, receiving a steady supply of weapons provided by the CIA, China and Saudi Arabia and delivered by ISI.

26. According to the Brigadier General of the Inter-Services Intelligence Directorate (ISI) responsible for directing this massive supply chain to the mujahidin, "up to 60 percent of our supplies" were routed through Khost and Paktia, a full third of this directly through Haqqani's headquarters and supply base at Zhawara, just four kilometers across the Afghanistan border.

27. HQN's identity and endurance are intimately tied to the geographically central terrain from which it emerged and in which it has always been based. Since the mid-1970s the HQN

¹ *Fountainhead of Jihad – The Haqqani Nexus*, Vahid Brown and Don Rassler, (2013), quoting Hearing before the Senate Armed Services Committee, September 2011.
<https://armed-services.senate.gov/statements/2011/09%20September/Mullen%2009-22-11.pdf>

has increasingly wielded a tremendous amount of operational and diplomatic influence over the Southeastern Afghan provinces of Khost, Paktia and Paktika (together known as Loya Paktia) and Pakistan's North Waziristan.

28. This mountainous region, which straddles the Durand Line, has long been a center for political resistance against Afghan regimes. Since the early 1980s the HQN has also had a presence in, and operational ties to, Kabul, Ghazni, Logar and Wardak.

29. During the insurgency against Soviet forces and the Afghan communist government, HQN was the only Afghan jihadi group to actively recruit and welcome into their rank foreign fighter volunteers. This innovation transformed the nature of the jihad in Afghanistan, linking it to broader struggles and giving birth to what would become known as the global jihad.

30. In 1980, Jalaluddin called for Muslims worldwide to come to Afghanistan and join the jihad. Many of those who heeded Jamaluddin's call would later play leading roles in AQ and the Taliban.

31. As a result of HQN's strategic decision regarding foreign fighters, Bin Laden ("Bin Laden") and his supporters established AQ and built training facilities and command and control infrastructure, in territory controlled by HQN.

32. One of the first Arab volunteers to link up with Jalaluddin was the Egyptian journalist Mustafa Hamid (better known by his nom de guerre, Abu'l-Walid al-Masri). After meeting with a group of Paktian 'ulama that were sent by Jalaluddin to Abu Dhabi in the spring of 1979, he and two of his Egyptian friends decided to make their way to the Haqqani fronts. Abu'l-Walid al-Masri spent the next eleven years fighting with the HQN and in the early 1990s, he began working closely with AQ, becoming the Emir ("commander") of AQ's al-Faruq training camp, located at the Haqqani base at Zhawara.

33. In late 1983 another Egyptian, 'Abd al-Rahman al-Masri came to join HQN and fought with Haqqani commanders until his death at Khost in 1988. Soon after his arrival, 'Abd al

Rahman al-Masri made a fateful introduction for another early Afghan Arab to the Haqqani scene: Abu Hafs al-Masri (Mohamad Atef).

34. Abu Hafs al-Masri was one of AQ's most talented, trusted, and militant members. Truly in Bin Laden's inner circle, he had been involved with AQ since its inception and served as its military commander and security chief. He was present at several key moments in the formation of AQ and even sat at bin Laden's side during his infamous press conference in 1998 when bin Laden formally established the formation of the "World Islamic Front for Jihad Against the Jews and Crusaders." As AQ's military commander, Abu Hafs' key duties were recruiting, vetting, and training new AQ members as well as planning and facilitating terrorist attacks. He was involved in organizing some of the group's more spectacular attacks, including the U.S Embassy bombings in East Africa and 9/11. His importance and influence on Bin Laden and the AQ organization cannot be overstated. In fact, ten months before Abu Hafs' death, Bin Laden personally nominated him as his replacement, and appointed him the first lieutenant, and subsequently head of, AQ's military committee.

35. Upon arrival at HQN's headquarters in Zhawara, Abu Hafs met Abu'l-Walid al-Masri, Abu 'Ubayda al-'Iraqi and another important Arab Haqqani ally - Abu 'Ubayda al Banshiri, who would later become AQ's first military commander, all of whom fought alongside Haqqani commanders and local fighters from 1984 on, including the 1986 battle against Soviet and Afghan forces in Zhawara.

36. In 1984, Palestinian Islamic scholar Abdallah Yusuf Azzam together with Bin Laden, Wa'el Hamza Julaidan and Ayman al-Zawahiri formed Maktab Khadamāt al-Mujāhidīn al-'Arab (Afghan Services Bureau, hereinafter "MAK") in Peshwar, Pakistan, to raise funds and recruit foreign mujahidin to support the jihad against the Soviets in Afghanistan.

37. Abdullah Azam had close relations with Jalaluddin and, while once staying at his home, wrote his detailed will before going with Haqqani forces into battle for the first time.

Jalaluddin's views on jihad and the obligation of all able-bodied Muslims to come to Afghanistan to assist in a worldwide jihad (published in 1980) influenced Azzam's views, which until then focused only on obtaining funding for the jihad in Afghanistan against the Soviet Union and Afghan communist, puppet regime.

38. In 1984, four years after Jamaluddin's call for global jihad, Azzam wrote his infamous fatwa, ruling that the Afghan jihad was an individual duty (fard 'ayn) borne by all able-bodied Muslims worldwide, which became the cornerstone and foundation for global jihad directed primarily against the United States and her allies.

39. Azzam wanted MEK to continue to focus on obtaining funding to support the Afghani jihad, building medical facilities in Pakistan, near the border, to treat mujahidin injured in the fighting, and recruit Arab Muslims to come to Peshawar for religious training and indoctrination into jihadi Islam.

40. Bin Laden wanted to recruit foreigners, especially Arabs, to actively participate in armed conflict, whereas Azzam wanted to concentrate on providing funding and supplies for the jihad and spreading his fatwa across the Muslim world to create a pure Islamic state, one of the pillars would be militant jihad.

41. In October 1986, Bin Laden (with support from the Bin Laden Construction company in Saudi Arabia) built a fortified training area on the front line of the battle zone against the Soviets, near the village of Jaji in Northern Paktia (in territory controlled and protected by HQN). He named the camp *Ma'sadat al-Ansar* (the Lion's Den of Supporters) (also called "*al-Masada*"), though it quickly became known as "*al-qaeda al-akkariyya*" (the military base), from which the name of Bin Laden's organization "Al-Qaeda" (literally, "the base") derived from.

42. In early 1987, Bin Laden, together with HQN commanders Abu Ubeida al-Banshiri and Mohamad Atef, established a special Arab force separate from the Afghani organizations at al-Masada.

43. Bin Laden also built additional training camps in Paktia, located along HQN's supply lines and near the sites of HQN's epic battles against communist forces.

44. Nestled in the mountains, Zhawara was central to the resourcing and development of a rich network of AQ, anti-Kashmir and other training camps. After the battle in 1986, Bin Laden invested heavily in repairing and fortifying the damaged base at Zhawara, with Jalaluddin having given him "three caves at the side of the base near the Afghan kitchen."

45. Recruits arriving in Pakistan would first be sent for training at HQN training camps, for indoctrination, basic training and vetting. Vetted recruits would be sent to Bin Laden's camp, where they received advanced training before setting out to fight the Soviets as part of a completely autonomous group. In April 1987, the al-Masada fighters achieved fame and glory throughout Afghanistan and the Arab world thanks to what came to be known as the Jaji battle, during which the fighters in this compound managed to hold out against Soviet forces for three weeks before repelling the attack.

46. Harmony document, AFGP-2002-800581, p. 5, in which the administrator of an AQ training camp at the main HQN base in Khost writes to AQ's leadership in Sudan (1994) that "the governor of Khost is from the Haqqani organization" and is protecting AQ from attacks by one of Gulbuddin Hekmatyar's commanders.²

² The CTC launched the Harmony Program in 2005 in order to release and analyze documents from the Department of Defense's Harmony database. The focus of this program is to contextualize the inner-functioning of al-Qa'ida, its associated movement, and other security threats through primary source documents. Harmony products released by the CTC are typically accompanied by an analytical report and the primary source material from which its conclusions are based. By releasing this material, the CTC aims to make these sources, which are captured in the course of operations in Iraq, Afghanistan, and other theaters, available to other scholars for further study. <https://ctc.westpoint.edu/harmony-program/>

47. According to a report published by the Combatting Terrorism Center at West Point, “the threat to U.S. national interests that emerged most fully on 9/11 stemmed from both Al-Qaeda and the Haqqani Network.”³

48. Throughout its history, the HQN has operated on and influenced militancy on the local, regional and global levels, the most underappreciated dimension of which is the global character of the HQN and the central role it has played in the evolution of AQ and the global jihadi movement. The HQN has been more important to the development and sustainment of AQ and the global jihad than any other single actor or group.

49. The HQN and AQ function as an interdependent system, and reveal that the seeds of global jihad were planted much earlier than previously thought and were nurtured just as much by the Haqqanis as by AQ, its predecessor organizations.

2. Defendant AQ

50. AQ is an international terrorist network that grew out of Makhtab al-Khidamat, an organization created by Usama Muhammed Awad and Bin Laden’s mentor, Sheikh Abdullah Azam, as an organization to fund fighters in Afghanistan. AQ, its affiliates, and those inspired by the group, have been involved in planning and executing attacks in Africa, Asia, Europe and North America, including the Terrorist Attacks on the U.S. Embassies in Nairobi and Dar es Salaam.

51. AQ was founded on August 11, 1987, by Bin Laden, Sobhi Abdel Aziz, Mohamed el Gohary, Abu Sinna, also known as Mohamed Atef, Abu Hafs al Masri, Abu Ubaidah al Banshri and others. From its creation until 1991, AQ was located in Afghanistan and in Peshawar, Pakistan. In 1991, the leadership of AQ, including its emir Bin Laden, relocated to the Sudan, while maintaining offices in various parts of the world. In 1996, Bin Laden and

³ *The Haqqani Network and the Evolution of Al-Qaeda*, Report of the Combatting Terrorism Center at West Point, Don Rassler and Vahid Brown. <https://ctc.westpoint.edu/wp-content/uploads/2011/07/CTC-Haqqani-Report-Rassler-Brown-Final-Web.pdf>

other members of AQ moved back to Afghanistan. From its creation until 1996, AQ's operations in Pakistan and Afghanistan, were under the protection and support of the HQN. From 1996 until late 2001, AQ operated in Afghanistan under the protection of the Taliban/HQN (which had unified).

52. AQ was designated by the U.N. on 6 October 2001 pursuant to the provisions of U.N. Security Council Resolution 1267 (1999) and Resolution 1333 (2000) for "participating in the financing, planning, facilitating, preparing or perpetrating of acts or activities by, in conjunction with, under the name of, on behalf or in support of", "supplying, selling or transferring arms and related materiel to" or "otherwise supporting acts or activities of" Bin Laden and the Taliban.

53. In 1998, AQ merged with Egyptian Islamic Jihad, led by Ayman Muhammed Rabi al-Zawahiri ("Zawahiri"), who became the most important leader in the organization after Bin Laden.

54. In 1988, AQ officially established itself as a clandestine, hierarchical organization, and it began to erect its first training camps: al-Faruq at Zhawara and the Jihadwal and Siddiq camps at Zhawara's south-eastern approach. Until the late 1990s, these camps would remain the core elements of AQ's infrastructure, and agents of all of AQ's major attacks during the 1990s would be trained in these facilities, including the Terrorist Attacks on the U.S. embassies in Nairobi and Dar es Salaam.

55. The makings of what would become the global jihadi movement were all also present: robust resource mobilization networks spanning the globe, training camps for foreign fighters of many nationalities, and open fronts for the transformation of international *mujahidin* — emigrants, into fighting *mujahidin*. Out of this mix, the self-proclaimed vanguard of that movement — AQ — would be born, and in a form that was and remains to this day inextricably connected to the HQN and the Taliban.

56. As a result of Saddam Hussein's war and occupation of Kuwait in 1990, Saudi Arabia request U.S. assistance and protection against a possible invasion by Iraqi forces, agreeing to the stationing of U.S. military on Saudi soil, and subsequently launching Operation Desert Shield from the Kingdom to eject Iraqi forces and reestablish the sovereignty of Kuwait. Radical Salafi religious leaders in Saudi Arabia and elsewhere objected to the request for assistance from "nonbelievers" (non-Muslims) and permitting nonbelievers to enter and reside in the holy lands of Saudi Arabia. Against the background of this acrimonious debate, Bin Ladin and much of AQ's leadership left Saudi Arabia and Afghanistan for Sudan, where the organization focused its early efforts on the actions within Arabian Peninsula and East Africa. Yet the HQN and AQ remained intertwined during this period, with the HQN providing the space, context and ideological support for AQ to operate training camps, conduct important media operations in Afghanistan and conduct jihad elsewhere.

57. During this transitional period, Bin Ladin and AQ were principally focused on repurposing the organization, continuing their training operations in Khost and establishing a presence in and around the Arabian Peninsula, especially in Yemen and Somalia. Although AQ did not know it at the time, the organization was on the cusp of a new mission, and the ideological support and assistance provided by Jalaluddin and the HQN would prove central to AQ's ability to train and deploy operatives, spread jihad and to define the United States as its primary enemy.

58. This is especially true with respect to AQ's early efforts in Africa. In July 1991, the same month that Bin Ladin and much of the senior leadership of AQ were settling into Khartoum, Jalaluddin published a lengthy communiqué and request for assistance by the Eritrean Islamic Jihad Movement (EIJM) in the Arabic-language *Manba' al-Jihad* – the first time that any such communication by a non-Afghan organization was published in the *Manba'*

magazines. Leaders of the EIJM were also enjoying Sudan's hospitality during this period, and AQ reportedly extended financial aid and training to the group at this time.

59. Jalaluddin also issued declarations of support in 1991 for the "jihad" being waged by the revolutionary Islamist regime of Hassan al-Turabi (in Sudan) against the Southern Sudanese forces of John Garang.

60. In 2002 Bosnian authorities raided the offices of the Benevolence International Foundation in Sarajevo and discovered statements calling for support of the Sudanese jihad written by both Jalaluddin Haqqani and Yunis Khalis. The correspondence discovered on the BIF computers also documents the extensive AQ infrastructure in and around Zhawara, Afghanistan at this time, referring to "centers which belong to AQ" at Zhawara, Bori, Jihadwal and Manikandaw, and noting that the Khost-area operations of AQ are "in the hands of Abu Hafs [al-Masri]." The files also included numerous records of transactions between AQ members, including Defendant Arnaout, and Hezb-e-Islami Khalis for vehicles and weapons, making frequent reference to AQ infrastructure in Paktia

61. These areas of cooperation demonstrate that the Haqqani-AQ alliance did not cease with Bin Ladin's move to Africa, but rather expanded and was considerably internationalized. But whereas Bin Ladin remained focused on the Arabian Peninsula, in 1991 and 1992, Jalaluddin spoke frequently about the need to expand jihad and the emergence of the United States as the next main enemy of the Muslim world following the disintegration of the Soviet Union.

62. Mawlana Fazlur Rahman, a leader of the Pakistani Islamist party Jamiat Ulema-e-Islam, said the following about Jalaluddin in 1992 (published in the Haqqani magazine *Manba al-Jihan* (Pashto), 3:9-10 (May 1992):

The Afghan jihad, which was spearheaded by Mawlawi Haqqani [Jalaluddin] and other truthful leaders, defeated the Soviet empire. But now there is another enemy to this jihad. That is America and its conspiratorial policies that are intended to bring Afghanistan, the center of jihad, under American attacks. But we are absolutely certain that people like Mawlawi Haqqani will give the Americans the same answer they gave to the Russians. And we are sure that people like Haqqani will fuel the flames of jihad worldwide.

63. During the 1990s, HQN leveraged its nexus position, looked outward, and played a critical role in enabling others to conduct and expand jihad. The quadrangle of relations between HQN, the Taliban, Pakistan and AQ, lie at the heart of the rise of the Taliban; and the initiation by AQ of a global campaign of political violence against the United States.

64. AQ has claimed responsibility for a number of large-scale terrorist attacks, including those on the United States Embassies in Nairobi, Kenya, and Dar es Salaam, Tanzania, in 1998; the attack on the U.S.S. Cole at the port of Aden and other attacks in Saudi Arabia and Yemen in 2000; the attacks in the United States on 11 September 2001, attacks in Turkey in 2003; in Saudi Arabia in 2004; in the United Kingdom in 2005, and others in Pakistan and Afghanistan since then. It has also inspired many other attacks, including in Europe, North Africa, the Middle East and Southeast Asia.

65. Planning and training for the Terrorist Attacks on the U.S. embassies in Nairobi and Dar es Salaam took place in Sudan, Iran, Hizballah controlled areas in the Beqaa Valley of Lebanon, and in AQ training camps in Taliban/HQN controlled areas of Afghanistan. The attacks occurred while Bin Laden and senior AQ leadership were in Afghanistan, sheltering in safe areas provided by the Taliban/HQN (anticipating retaliation from the United States).

3. Defendant Taliban.

66. The Taliban is a terrorist organization established by Afghan students (“talibs”) and graduates of the Darul Uloom Haqqania seminary in Pakistan in 1994, under the leadership of Mullah Mohammed Omar Mujahid. Mullah Omar was succeeded upon his death by Akhtar Mohammad Mansour (who, prior to 2001, served, among other positions, as Minister of

Defense), who was killed by a U.S. drone strike on 21 May 2016. Currently, the former Chief Justice of the Sharia Courts of the Islamic Emirate of Afghanistan, Hibatullah Akhunzada, is the supreme leader of the Taliban. Sirajuddin Haqqani, son of Jamaluddin Haqqani, is deputy supreme leader.

67. The Taliban, which also refers to itself by the name of its “state,” the Islamic Emirate of Afghanistan, is a Deobandi-Pashtun Islamic fundamentalist, militant Islamist, and jihadist political movement in Afghanistan. HQN and the Taliban jointly comprise the governing bodies and command structure of the Islamic Emirate of Afghanistan. It ruled approximately three-quarters of the country from 1996–2001, before being overthrown following the United States invasion. From its expulsion from Afghanistan in 2001, until 2021, the Taliban and HQN continued to jointly operate as the Islamic Emirate of Afghanistan (in exile) from territory controlled by HQN and by the Taliban in Pakistan. Together with the HQN, it recaptured Kabul on 15 August 2021 after years of insurgency, and currently controls all of the country.

68. Shortly after joining the Taliban in 1995, Jalaluddin recruited for the Taliban about 2,000 fighters from Paktia and neighboring Pakistan. Jalaluddin also commanded Taliban troops in Kabul during this time and forces led by Haqqani are credited with repulsing a major assault on the capital carried out by Uzbek commander Abdul Rashid Dostum in 1996. The HQN’s ability to train and raise fighters similarly proved critical to the Taliban in various battles in Afghanistan’s North against the Northern Alliance.

69. The relationship between AQ and the Taliban started in 1996, when, at Jamaluddin’s request, the Taliban allowed Bin Ladin and a group of his Arab followers to stay under the Taliban’s protection in Afghanistan. Ever since then, the two entities have been allies.

70. After Bin Laden published his 1996 fatwa, Mullah Omar ordered Bin Ladin and his family to relocate to Kandahar (the birthplace of the Taliban), “where the situation is more secure.”

71. In February 1998, in the run-up to the bombings of the U.S. Embassies in Nairobi and Dar es Salam, Bin Laden, Zawahiri and several leaders from other jihadist organizations announced the formation of the “World Islamic Front for Jihad against the Jews and Crusaders” at the al-Siddiq Camp in the Zhawara Valley, under the protection of the Taliban/HQN. The fatwa called for global jihad and called on Muslims worldwide to “kill the Americans wherever you find them.”

72. Mullah Muhammad Omar, never openly disavowed Bin Ladin or AQ nor blamed him for bringing about the Taliban regime’s demise in 2001. When Bin Ladin was killed in 2011, the Taliban leadership issued a public eulogy, which is customary among militant Islamists. Bin Ladin’s successor, al-Zawahiri, subsequently renewed his oath of allegiance to Mullah Omar.

73. After the fall of the Taliban regime in December 2001, AQ built a new safe haven in the Federally Administered Tribal Areas (FATA) of Pakistan, in particular in the South and North Waziristan agencies. From here, AQ started supporting the nascent Taliban insurgency in Afghanistan through the HQN.

74. Mullah Omar’s demise in 2015, sparked a leadership crisis within the Taliban. Part of the organization, including Mullah Omar’s sons, refused to accept Mansour as the new leader. In the end, the various Taliban factions reached a compromise in which Sirajuddin Haqqani, son of Jalaluddin Haqqani and current leader of the “HQN,” was elevated to the position of deputy supreme leader, a position he continues to hold under Mansour’s successor, Mullah Haibatullah.

75. 17 of the 21 other ministers and members of the Shura Committee, served as high-ranking officials in the Taliban regime from 1996-2001.

76. The details of the integral relationship between HQN and AQ was detailed in testimony before the Senate Committee on Armed Services Committee⁴:

“The Haqqani Network is an integral part of the Taliban and closely allied with al-Qaeda.

Throughout much of the war, the United States targeted members of the so-called Haqqani Network. Yet some misconceptions about the Haqqanis linger. For example, some U.S. officials have suggested that the Haqqani Network is really an independent entity and not truly a part of the Taliban. That is false. The Haqqanis are an integral part of the Taliban, holding key positions throughout the group’s hierarchy and running the Taliban’s most lethal special forces. Indeed, the “Haqqani Network,” a U.S.-designated foreign terrorist organization, is partly an American construct. This concept obscured the U.S. government’s understanding of how the Taliban is really organized.

The patriarch of the Haqqani family, Jalaluddin, was Osama bin Laden’s most important benefactor and ally. According to bin Laden’s bodyguard, Jalaluddin helped bin Laden escape in late 2001. The first generation of al-Qaeda’s leadership was incubated in Jalaluddin’s camps in eastern Afghanistan...

Jalaluddin, who was the top Taliban military commander in late 2001, steadfastly refused to break with bin Laden and al-Qaeda... Before I examine the current role played by his family members, I want to look briefly at the Darul Uloom Haqqania seminary in Pakistan. Jalaluddin took this religious institute’s name as his own.

Samiul-Haq, the longtime chancellor of Darul Uloom Haqqania, was killed in a knife attack in 2018. Both the Taliban and the Pakistani military mourned him. By the time of Haq’s death, it is likely that tens of thousands of students had passed through Haqqania’s doors. Haq has been nicknamed the “Father of the Taliban,” and his influence on the organization cannot be overstated...⁵

Multiple leaders in the Taliban’s Islamic Emirate are graduates of Haqqania, and some of al-Qaeda’s leaders have been educated there as well. Zabihullah Mujahid, the Taliban’s longtime spokesman, recently explained that he is “a native of Paktia Province,” a Haqqani stronghold, as well as a “graduate in Islamic jurisprudence from

⁴ Thomas Joscelyn, Senior Editor of the Foundation for Defense of Democracy Long War Journal, September 30, 2021.

<https://www.armed-services.senate.gov/imo/media/doc/09-30-21%20Joscelyn%20ASC%20Testimony1.pdf>

⁵ Maria Golovnina and Sheree Sardar, “Pakistani ‘Father of Taliban’ keeps watch over loyal disciples,” Reuters, September 15, 2013.

<https://www.reuters.com/article/pakistan-taliban/pakistani-father-of-taliban-keeps-watch-over-loyal-disciples-idINDEE98E03320130915>

the well-known Darul Uloom Haqqania madrasa in Pakistan.” Asim Umar, the first emir of Al-Qaeda in the Indian Subcontinent (AQIS), was reportedly educated at Haqqania. Umar was killed during a September 2019 counterterrorism raid in Musa Qala, Helmand, a Taliban stronghold.”

77. Sirajuddin Haqqani is the deputy Emir (supreme leader) and the Taliban’s interior minister, commander of all Taliban/HQN military, security and police forces. Sirajuddin has been the Taliban’s Deputy Emir since he replaced his father, Jalaluddin, in 2015. Sirajuddin’s close working relationship with AQ is well-known. Both the United States and United Nations have designated him as a terrorist, in part because of his bond with AQ.⁶ The State Department has also offered a reward of up to \$10 million for information on Sirajuddin’s whereabouts, noting that his network is “allied with” AQ.⁷

78. Sangeen Zadran, a senior aid to Sirajuddin Haqqani, was designated as a terrorist by the U.S. State Department in 2011. The State Department reported that Zadran was “believed to have planned and coordinated the movement of hundreds of foreign fighters into Afghanistan,” including AQ members. In September 2009, AQ’s central media arm, As Sahab, released an interview with Sangeen, in which he confirmed:

*All praise is for Allah, Al-Qaeda and Taliban all are Muslims and we are united by the brotherhood of Islam. We do not see any difference between Taliban and Al-Qaeda, for we all belong to the religion of Islam. Sheikh Usama has pledged allegiance to Amir Al-Mumineen (Mulla Muhammad Umar) and has reassured his leadership again and again. There is no difference between us, for we are united by Islam and the Sharia governs us.*⁸

⁶ The United Nations reported that Sirajuddin “is one of the most prominent, influential, charismatic and experienced leaders within the Haqqani Network ... a group of fighters with a close association with both the Taliban and Al Qaeda.” The United Nations added that Sirajuddin “derives much of his power and authority from his father, Jalaluddin Haqqani,” who “established very close links with Al Qaeda.” See: UN Security Council, “Sirajuddin Jallaloudine Haqqani,” September 13, 2007.

<https://www.un.org/securitycouncil/sanctions/1988/materials/summaries/individual/sirajuddin-jallaloudine-Haqqani>

⁷ U.S. Department of State, Rewards for Justice, “Sirajuddin Haqqani,” accessed September 28, 2021. https://rewardsforjustice.net/english/sirajuddin_haqqani.html

⁸ Bill Roggio, “An interview with Mullah Sangeen,” FDD’s Long War Journal, September 17, 2009. https://www.longwarjournal.org/archives/2009/09/an_interview_with_mullah_sange.php

79. Khalil Haqqani is one of Jalaluddin's brothers and one of Sirajuddin's uncles. Khalil has been named the Taliban's minister of refugees, a position that may give him the power to protect AQ figures, as some are likely considered "refugees" in the Islamic Emirate of Afghanistan. Khalil's relationship with AQ has long been known. The U.S. Treasury Department designated Khalil Haqqani as a terrorist in 2011, describing him as "among the HQN's most important figures and fundraisers." Treasury reported that in addition to fundraising for the Taliban, overseeing "the detention of enemy prisoners," and taking operational orders from his nephew (Sirajuddin), Khalil worked with AQ. Khalil has "acted on behalf of Al Qaeda and has been linked to Al Qaeda military operations." Khalil supported AQ at crucial moments in the group's history. In 2002, when the United States was hunting AQ fighters in eastern Afghanistan, Khalil deployed "men to reinforce AQ elements in Paktia Province, Afghanistan."

80. Yahya Haqqani is Sirajuddin's brother-in-law and a U.S.-designated terrorist. The U.S. Treasury Department has explained that Yahya is so senior within the HQN that he has "acted as de facto head of the group when" other senior leaders, such as Sirajuddin and Khalil, are "absent." Yahya has been "closely involved" in the HQN's "military, financial, and propaganda activities," often working with Sirajuddin. Like his brother-in-law, Yahya works with AQ. Treasury explained that Yahya "sometimes serves as a liaison between the" HQN and AQ and "has maintained ties with [AQ] since at least mid-2009."

81. According to the report of the Analytical Support and Sanctions Monitoring Team submitted to the President of the Security Council on 27 May 2020, "[t]he senior leadership of Al Qaeda remains present in Afghanistan, as well as hundreds of armed operatives. Relations between the Taliban, especially the Haqaani Network, and Al Qaeda remain close, based on friendship, a history of shared struggle, ideological sympathy and intermarriage.

The Taliban regularly consulted with Al Qaeda during negotiations with the United States and offered guarantees that it would honor their historical ties.”⁹

82. On August 20, 2021, H.R. 5066 (the Afghanistan Accountability Act) was referred to the House Committee on Foreign Affairs, containing the following (Section 6):

“In this Act, the term “Taliban”—

(1) refers to the organization that was founded by Mohammed Omar, and that is currently led by Mawlawi Hibatullah Akhundzada; and

(2) includes subordinate organizations, such as the Haqqani Network, and any successor organization.”

83. Upon the defeat of Taliban/HQN/AQ forces in 2001, the majority of leadership and surviving jihadis crossed the border into Pakistan and were sheltered by the Haqqanis. In Haqqani-controlled Quetta, Pakistan, the Taliban/HQN/AQ were able to regroup, and launch a 20-year offensive, resulting in the recapture of all of Afghanistan, and the return of the Taliban-Emirate of Islamic Afghanistan.

4. Defendant Islamic Emirate of Afghanistan.

99. Upon obtaining control over the majority of territory in Afghanistan in or about 1996, the Taliban and the HQN assumed de-facto control over the government of Afghanistan and formed what it called the “Islamic Emirate of Afghanistan,” as the successor government of Afghanistan, led by the Taliban leader, Mullah Mohammad Omar (“Omar”).

100. All references and allegations made herein relating to acts of the Taliban from the period subsequent to Omar’s declaration of the formation of the Islamic Emirate of Afghanistan on September 27, 1996, until today shall refer to both the Taliban and its assumed name of the Islamic Emirate of Afghanistan.

⁹ <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N20/110/60/PDF/N2011060.pdf?OpenElement>

101. The United Nations did not recognize this government and no other state recognized it, except for the Islamic Republic of Pakistan, the Kingdom of Saudi Arabia and the United Arab Emirates.

102. In 2001, U.S. and coalition forces, forced the Taliban to flee Afghanistan, relocating as a “self-proclaimed government in exile” (continuing its self-designation as the Islamic Emirate of Afghanistan) in territory controlled by the HQN in Pakistan.

103. In 2003, the people of Afghanistan ratified a new constitution and elected a civilian government called the Islamic Republic of Afghanistan, which was recognized by the United States and the international community. The Taliban, HQN and AQ, continued to jointly wage an insurrection, from their headquarters in Haqqani controlled city of Quetta, in Pakistan, until reestablishing control over the territory of Afghanistan, and relocating its de-facto government based in Kabul and/or Kandahar, calling itself the Islamic Emirate of Afghanistan.

104. To date, no country has recognized the Islamic Emirate of Afghanistan as the lawful government of Afghanistan, nor the legal authority of the Taliban and HQN to govern Afghanistan.

5. Defendant Da Afghanistan Bank.

105. Da Afghanistan Bank (“DAB”) was established in 1939 (under the ownership of the Afghani government), with authority to conduct banking activities and establish branches in Afghanistan. Government bank accounts were subsequently transferred to DAB from other local Afghani banks.

106. From its establishment until 2001, DAB conducted commercial banking activities as other Afghani commercial banks, in addition to managing the state’s banking affairs.

107. After the adoption of the new constitution in 2003, Da Afghanistan Bank was reconstituted as an independent institution, under the management of an independent Supreme Council, and promoted to act as the Central Bank of Afghanistan.

108. After the fall of the Islamic Republic of Afghanistan in August 2021, the Supreme Council of DAB was dissolved, all of the Council members fled Afghanistan, and ownership and control of DAB reverted back to the Taliban, as its private bank.

109. The Supreme Council of the bank was reconstituted with senior Taliban members including the following Abdul Qahir (Haji Idress), acting Governor and members of its Shura Committee (governing body) have been designed by the Treasury Department for involvement in terrorism and terrorism financing.

110. All bank accounts and funds of DAB held outside of Afghanistan, have been frozen by the United States and other governments.

111. On February 11, 2022, President Joe Biden announced that he intended to move \$3.5 billion from the account to a trust fund to support humanitarian assistance in Afghanistan, and reserve \$3.5 billion for potential legal claims by families of the victims of the September 11 attacks.

C. Non-Defendant, Co-Conspirators

1. Non-Defendant Co-Conspirator BNP Paribas S.A.

112. BNP Paribas is a French bank, the ninth largest bank in the world, with over 190,000 employees and with offices and branches in the United States and other countries.

113. On July 1, 2014, BNPP pleaded guilty in Federal Court to unlawfully transferring U.S. dollars to Sudan and other sanctioned countries, intentionally omitting any reference in the payment messages to the origination and/or destination of these funds in order to avoid the transactions from being blocked. BNPP paid fines totaling \$8.9 billion.

114. BNPP admitted to entering into a conspiracy with Sudan, its Central bank and other banking institutions within Sudan, including Islamic Bank Al Shamal, and AQ, to oppose, counter, and defeat United States law through unlawful means, including fraudulent financial transactions, violations of sanctions against Sudan:

Soon after the imposition of U.S. sanctions against Sudan in 1997, BNPP Geneva established account relationships with unaffiliated regional banks ('Regional Banks') located in Africa, Europe and the Middle East, eventually nine in all, some with no other business purpose than to clear payments for Sudanese client. The accounts with the Regional Banks were created and established to provide a means to circumvent U.S. sanctions.

115. The Government of Sudan and BNPP conspired to conceal and hide the ownership, control, and interest of the Sudanese government and Sudanese banks such as Al Shamal to enable Sudan access to the critically important U.S. financial markets and to avoid blocking of Sudanese funds within the United States. As a result of this conspiracy, the Government of Sudan and AQ had access to the U.S. financial system and material support to facilitate the 1998 East African Embassy Attacks as part of an alternative means to defeat the U.S. sanctions by fear and terror.

116. BNPP's deceptive scheme to evade and defeat U.S. economic sanctions and conceal the transfer of funds on behalf of Sudan and Sudanese SDNs (including through false and misleading reports submitted to OFAC in Washington, D.C.) frustrated the efforts of the U.S. Government, specifically the U.S. Department of the Treasury, to detect and disrupt AQ terrorist activities. Thus, this fraudulent scheme was a direct and proximate cause of the 1998 East African Embassy Attacks.

2. Non-Defendant Co-Conspirator Al Shamal Islamic Bank

117. Al Shamal is a Sudanese bank established in Khartoum, Sudan in 1983. Al Shamal started operations on January 2, 1990, in part with a capital contribution of at least \$50 million by Bin Laden.

118. Al Shamal knowingly and intentionally provided financial services to AQ including maintaining and servicing AQ bank accounts and the Bank's leadership including its Chairman Abel Batterjee (Bin Laden's brother-in-law) was closely involved in developing a world-wide financial network that allowed AQ operatives access to funds in the United States directly

through Al Shamal and laundered funds on behalf of AQ through charities controlled by Batterjee and his associates in the United States. Batterjee's management of these charities was conducted in concert with his illegal activities as the owner and officer of Al Shamal.

119. During the 1990s, Al Shamal held a correspondent bank account at United European Bank, a subsidiary of BNPP. BNPP and/or United European Bank continued its facilitation of Al Shamal transactions even after public reporting of its ties to AQ following the 1998 East African Embassy Attacks.

120. At a 2001 Congressional hearing, Senator Carl Levin publicly and specifically noted that Bin Laden and AQ operatives used Al Shamal in the years leading to the 1998 terrorist bombings of the U.S. embassies in Kenya and Tanzania.

3. Non-Defendants Co-Conspirators Islamic Republic of Iran, Islamic Revolutionary Guard Corps., Hizballah and the Islamic Revolutionary Guard Corps.-Quds Force.

121. The Islamic Republic of Iran is currently designated, and has been designated every year since 1987, as a State Sponsor of Terrorism by the Secretary of State pursuant to section 6(j) of the Export Administration act of 1979(50 U.S.C. App. 2405(j)).

122. On November 28, 2011, the United States District Court for the District of Columbia found that Iran provided material aid and support to AQ for the bombings of the U.S. embassies in Nairobi and Dar es Salaam, attacks with killed and injured the Plaintiffs. *Owens v. Republic of Sudan*, No. 14-5105 (D.C. Cir. 2017). The Court made the following findings:

Hezbollah engages in international terrorist operations in close tactical and strategic cooperation with the Iranian government...The Supreme Leader of Iran, Ayatollah Khamenei, controls oversight of the media, the military, the Ministry of Intelligence, the IRGC, the Basji militia and the IRGC's Qods Force: all the entities that oversee the training and support of and cooperation with terrorist groups and that grant approval of terrorist attacks conducted with other groups answer to Khamenei...Hezbollah's assistance to al Qaeda would not have been possible without the authorization of the Iranian government.... Support from Iran and Hezbollah was critical to al Qaeda's execution of the 1998 embassy bombings... Prior to its meetings

with Iranian officials and agents, al Qaeda did not possess the technical expertise required to carry out the embassy bombings. In the 1990s, al Qaeda received training in Iran and Lebanon on how to destroy large buildings with... sophisticated and powerful explosives... The government of Iran was aware of and authorized this training and assistance. Hence, for the reasons described above, the Court finds that the Iranian defendants provided material aid and support to al Qaeda for the 1990 embassy bombings and are liable for plaintiffs' damages.

123. Iran, IRGC, Hizballah, IRGC-Quds Force, the Taliban, HQN, Islamic Emirate of Afghanistan, and Arnaout jointly and severally committed, planned and/or authorized the attacks on the U.S. embassies in Nairobi and Dar es Salaam, perpetrated by AQ.

124. The IRGC and Hizballah are designated Foreign Terrorist Organizations and IRGC-Quds Force is designated as a Specially Designated Global Terrorist.

IV. The Joint Criminal Enterprise/Conspiracy

125. HQN's critical support and assistance led to the creation and growth of AQ in 1988, and the Taliban in 1994. AQ, the Taliban and HQN entered into a joint criminal enterprise to wage a global war of terrorism against the United States, its allies, and others including the following co-conspirators and aiders and abettors:

- a. Defendant Da Afghanistan Bank;
- b. Illinois based-Benevolence International Foundation, Inc. ("BIF") and its predecessor Lajnatt Al-Birr Al-Islamiah ("LBI"), including its founder (U.S. and U.N. designated AQ financier and brother-in-law of Bin Laden) Adel Abdul Jalil Ibrahim Batterjee ("Batterjee") (who was a designed financier of AQ) and its President, defendant Enaam M. Arnaout ("Arnaout");
- c. The Republic of Sudan (which during the time relevant to the attacks on the U.S. Embassies, was a designated State Sponsor of Terrorism), including the Ministry of Interior of Sudan;
- d. The Central Bank of Sudan;

- e. BNP Paribas S.A. (which was convicted of felony violations of U.S. sanctions, admitting to intentionally laundering over \$60 billion for Sudan and over \$120 billion for Iran), including one of its largest shareholders and a member of its International Committee of the Board of Directors, Nadhmi Shakir Auch;
- f. Islamic Bank al-Shamal (which held bank accounts for Bin Laden and AQ operatives, and provided hundreds of thousands of U.S. dollars in cash which were used in the perpetration of the attacks on the U.S. Embassies in Nairobi and Dar es Salaam), including its founders Bin Laden and the Chairman of the Board, Batterjee;
- g. The Islamic Republic of Iran, including the Ministry of Intelligence and Security of Iran (which at all times was and continues to be a designated State Sponsor of Terrorism);
- h. IRGC (which is a designated FTO);
- i. Hizballah (which is a designated FTO); and
- j. Islamic Revolution Guard Corps – Quds Force (“IRGC-QF”) which is a Specially Designated Global Terrorist (“SDGT”);

126. Commencing in 1987 and continuing until today, HQN provides weapons, safe harbor, military training, joint military operations and strategic direction and planning to AQ, and guided Bin Laden and AQ to transition from local/regional jihad, exclusively directed first against Soviet forces and Afghanistan, and subsequently against the Saudi Arabian regime, to global jihad, directed primarily against the United States and its allies.

127. Commencing in 1992, and until at least 2002, Arnaout and BIF provided financing and weapons procurement for AQ and the Taliban/HQN through its offices and affiliates in Illinois, Pakistan, Afghanistan, Bosnia, Saudi Arabia, United Arab Emirates and Sudan.

128. In 1991, HQN encouraged Bin Laden to move AQ to Africa, to assist the newly formed Islamist regime of Sudan, under the control of the Sudanese National Salvation Front,

conduct a jihad against the Christian and animist populations in the south of Sudan and American and African Union forces in Somalia. During this period (1991-1996) HQN continued to maintain, supply, protect and support senior AQ commanders and AQ bases in Afghanistan, in areas controlled by HQN.

129. HQN and HQN leaders in Afghanistan, who also served as AQ leaders, convinced Bin Laden to direct AQ's jihadi activities away from the Kingdom of Saudi Arabia and to Somalia, resulting in the defeat of U.S. forces known as the "Black Hawk Down" incident. After the "success" in defeating U.S. forces and causing the withdrawal of U.S. forces from Somalia, Bin Laden redirected the focus of AQ to pursue global jihad, primarily against the United States and its allies.

130. Hassan Al-Turabi, leader of the National Islamic Front and head of the only Sunni Islamist/Salafi movement to take control of a state, was labeled by Human Rights Watch "the power behind the throne" from 1989 to 2001. Turabi was a leader of the opposition to the American-Saudi coalition forces in the 1st Gulf War (to liberate Kuwait) and established in 190-1991 the Popular Arab and Islamic Congress, an umbrella group of over 50 terrorist organizations dedicated to perpetrating violence against the United States and its allies.

131. Turabi brought together Bin Laden, General Qassem Suleimani (head of the IRGC-QF) and Imad Mughniyeh (head of the Hizballah military wing, and commander of numerous attacks against the United States, including the bombing of the Marine Barracks in Beirut and the bombing of the U.S. embassy in Beirut), which resulted in Iran and Hizballah providing intelligence and training for the attacks on the U.S. embassies in 1998.

132. Arnaout opened BIF offices in Sudan to help fund the internal Sudanese jihad as well as AQ operations in Africa.

133. BNP Paribas entered into a criminal conspiracy with Sudan and the Central Bank of Sudan, to become the sole correspondent bank for providing (illegally and in violation of sanctions) access to the U.S. financial system for Sudan and its banks.

134. As part of this conspiracy, the Central Bank of Sudan directed all Sudanese banks, including Islamic Bank al-Shamal, to conduct U.S. dollar transactions via BNP Paribas. BNP Paribas thus became the* Central Bank for Financing Terrorism in Sudan, including the provision of U.S. dollars to the Islamic Bank Al-Shamal, which in turn, provided Bin Laden and AQ the cash in U.S. dollars required and necessary to perpetrate the attacks on the U.S. embassies in Nairobi and Dar es Salaam.

135. HQN joined together with the Taliban in 1994, assuming command of military operations and part of the ruling Shura Council, and governor of the Nangarhar, Patia, Paktika and Khost districts of Afghanistan (over one-third of territory controlled by the Taliban/HQN.

136. In 1996, Bin Laden, and part of the AQ team in Sudan, returned to Afghanistan, under the protection and with the support of the Taliban/HQN.

137. Training for the perpetrators of the attacks on the U.S. embassies in Nairobi and Dar es Salaam, commenced in HQN training camps, with advance training in AQ camps in Afghanistan under the protection and control of HQN/Taliban, followed by specialized training in Teheran and the Beqaa Valley, Lebanon by the IRGC and Hizballah.

138. The attacks were launched from Sudan, with the assistance of Sudanese government offices.

COUNT I

(Violation of the Law of Nations)

139. Plaintiffs repeat and re-allege each and every allegation set forth above with equal effect as if alleged herein.

140. “Violations of the law of nations” include “those ‘violations of . . . international law norm[s] with [as] definite content and acceptance among civilized nations [as] the historical paradigms familiar when [the ATS] was enacted [in 1789].” *Mastafa v. Chevron Corp.*, 770 F.3d 170, 180 (2d Cir. 2014).

141. Conduct that infringes upon the rights of ambassadors has long been recognized as an actionable violation of the law of nations. See, e.g., *Sosa*, 542 U.S. at 715, 719–720 (explaining that Congress intended the ATS to give federal courts jurisdiction to adjudicate tort actions for offenses against ambassadors).

142. International humanitarian law norms are universally accepted to apply, not only to military forces of States, but also to nonstate organized militia forces commanded by a hierarchal command structure. AQ, the HQN and the Taliban are each subject to compliance with international humanitarian law, including prohibitions against torture (including extrajudicial killing), targeting protected persons, such as civilians, noncombatants and diplomats, and failure to distinguish between military and civilian targets. The bombings of the embassies in Nairobi and Dar es Salaam constituted grave violations of international humanitarian law.

143. The Second Circuit has recognized claims for violations of torture as actionable under ATS. Under international law, the term "torture means any act by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person for such purposes as ...intimidating or coercing him or a third person...when such pain or suffering is inflicted by or at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity.”¹⁰ Pain or suffering includes both physical and mental suffering.

¹⁰ Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, https://legal.un.org/avl/pdf/ha/catcidtp/catcidtp_e.pdf

99. Widespread and systematic attacks against civilians are likewise universally recognized as violations of international human rights law. Defendants AQ, HQN and the Taliban have perpetrated widespread and systematic, decades-long campaigns of global jihadi directed against the United States, American citizens, employees of the U.S. government and members of the U.S. armed forces, and allies, including the following acts of international terrorism:

- a. Suicide bombing of the United States embassies in Nairobi and Dar es Salaam, on August 7, 1998.
- b. Suicide bombing of the U.S.S. Cole, on October 12, 2000.
- c. Suicide bombings of the World Trade Center, the Pentagon, flight 93 on September 11, 2001.
- d. Suicide bombing on the Khobar Towers residential complex in Saudi Arabia on June 25, 1996.
- e. Bombings of trains in Madrid, Spain on March 11, 2004.
- f. Bombings of London subway and public buses on July 7, 2005.
- g. Bombing of Paddy's Discotheque night club in Bali on October 12, 2002.

100. August 23, 1996-Bin Laden and other radical Islamist religious scholars (comprising the AQ ‘shura council’) issued the first “fatwa” declaration of war against the United States and its allies, calling for the extrajudicial killing of Americans wherever they are located. The shura council met and published this fatwa from its headquarters located in territory controlled by and protected the HQN.

101. In addition to aiding and abetting AQ in the attacks on the U.S. embassies in Nairobi and Dar es Salaam, Iran has been held liable for aiding and abetting numerous attacks against U.S. embassies, including the following:

- a. bombing of U.S. embassy in Beirut, Lebanon, 1983, *Relvas, et al. v Islamic Republic of Iran*, Case No.: 1:14-cv-01752-RCL (D.D.C. Feb. 27, 2018) [not reported in the federal supplement];
- b. the suicide bombing of the Marines barracks in Beirut in 1983, *Peterson v. Islamic Republic of Iran*, 264 F. Supp. 2d 46 (D.D.C. 2003);
- c. extrajudicial killing American diplomat, USAID Executive Director, in Amman, Jordan, October 28, 2002, by AQ in Iraq, *Foley v. Islamic Republic of Iran*; and
- d. kidnapping, torture (for 444 days) resulting in his death of U.S embassy diplomat, CIA station chief William Francis Buckley in Beirut, in March 1984. *Surette v. Islamic Republic of Iran*, 231 F. Supp. 2d 260 (D.D.C. 2002).

102. During the years 1995-1998, Iran provided and continues today to provide financing and material support to AQ, the HQN and the Taliban in support of the widespread and systematic attacks against U.S. embassies, ambassadors and diplomats, as part of the shared goal of Iran and the defendants to coerce the United States to withdraw its support from moderate Middle East allies and from the Middle East and all Muslim countries. The bombing of the U.S. embassies in Nairobi and Dar es Salaam also constituted grave violations of international human rights laws.

103. In 1980, the HQN published a call to all Muslims, to join in a global jihad as an individual duty incumbent upon all Muslims, wherever located. In 1984, Abdullah Azam, a world-renown Muslim religious scholar, similarly called upon all Muslims to join a transnational jihad, against any party deemed to be “oppressing Muslims.”

104. Bin Laden, Ayman Zawahiri and AQ established training camps under the protection of the HQN (in territory they controlled in Afghanistan), and after 1995, after the integration of the HQN as an integral component of the Taliban, under the protection of, and in territories controlled by the Taliban and the HQN.

105. In 1992, Jalaluddin Haqqani sent Bin Laden to Sudan, to establish a base there and participate in the jihads being waged by the radical Islamist government of Sudan against the Christians in the south of Sudan and non-Arabs in the Darfur region.

106. In 1996, under the protection of the HQN and the Taliban, in territory controlled by them, Bin Laden and Zawahiri issued a fatwa calling upon all Muslims to kill Americans wherever located.

107. Upon the urging of Hassan al Turabi and Sudanese officials, Bin Laden and AQ, with the support of each of the Defendants, launched the massive, simultaneous, suicide truck bombings attacks on the United States embassies in Nairobi and Dar es Salaam, killing hundreds of diplomats, embassy employees, visitors, and bystanders, and wounding over 5,000 diplomats, embassy employees and civilians.

108. The Defendants infringed upon the rights of ambassadors and embassy staff and their families, protected under international law, perpetrated violations of international humanitarian law and grave violations of international human rights law, joining a joint criminal enterprise, conspiracy with, and/or aiding and abetting Bin Laden and AQ, in waging a global jihad against the United States and its allies, the intent and purpose of which was, and continues to be, the removal of United States influence and support of moderate Arab and Muslim regimes, conversion of such regimes and their Muslim populations to radical Salafi jihadi regimes, and ultimate destruction of the United States. The foreseeable and known object in this enterprise, was the attack and destruction of the United States embassies in Nairobi and Dar es Salaam, and the killing and injuring of thousands of diplomats and other non-combatants, all in blatant and intentional violation of the laws of nations.

109. Plaintiffs were killed or injured (physically and/or emotionally) in these bombings.

110. As a direct and proximate consequence of the several and joint acts of each Defendant as set forth above and the injuries thereby inflicted, the Plaintiffs have suffered the loss of

immediate family members, physical, emotional and economic damages, and/or been required to undergo extensive medical treatment, nursing care, and other treatment, for which they have been required to expend funds, have occasioned a loss of wages, and have endured great pain and suffering, humiliation, and embarrassment, and have thereby suffered damages as set forth below

111. WHEREFORE, the Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, prejudgment interest, costs, attorneys' fees, and any other monetary or equitable relief the Court may deem proper.

COUNT II

(Joint Criminal Enterprise/Conspiracy to Violate the Law of nations)

112. The Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

113. Each of the Defendants is liable, jointly and severally, for knowingly and intentionally joining a conspiracy and/or a joint criminal enterprise, to perpetrate the bombings of the United embassies in Nairobi and Dar es Salaam in violation of the laws of nations, jointly participate in a global jihad against the United States and its allies, and Americans, in violation of the laws of nations, including without limitation, attacking embassies and embassy personnel (and their families), perpetrating widespread and systematic violence against civilians, extrajudicial killing, torture, using explosive devices in public areas and public transportation vehicles, terrorizing civilian populations, providing financing material supports for this global jihad, and other international crimes.

114. As alleged above, the embassy bombings perpetrated by Bin Laden and AQ unquestionably interfered with the rights of ambassadors in violation of the law of nations, and violated international humanitarian and human rights law. Bin Laden and AQ's actions risked, and caused serious injury or death to ambassadors and civilians and impinged upon the diplomatic mission of the United States in Kenya and Tanzania, thereby violating the law of

nations. See, e.g., *Ofisi v. BNP Paribas, S.A.*, 278 F. Supp. 3d 84, 106–07 (D.D.C. 2017) (finding the plaintiffs adequately pled a violation of the law of nations based on the 1998 embassy bombings); *Mwani v. Bin Ladin*, 2006 WL 3422208, at *4 (D.D.C. Sept. 28, 2006) (same).

115. The bombings intended to, and in fact did, kill or (physically and/or emotionally) injured each of the Plaintiffs.

116. Defendant HQN directed and assisted Bin Laden and AQ in relocating operations to Sudan with the specific intention to conduct violent jihad against the United States government and Americans in eastern Africa, including U.S. embassies in Kenya and Tanzania.

117. AQ operatives, who perpetrated the attacks on the U.S. embassies, were trained in AQ and the HQN training camps located in Afghanistan, under the protection of the Taliban/The Islamic Emirate of Afghanistan and HQN.

118. Arnaout provided financing for AQ's operations, including the bombing of the U.S. embassies, from his base in Illinois to AQ accounts held in Afghanistan and in Sudan, with the assistance of Da Afghanistan Bank.

119. The Defendants individually or jointly, entered into agreements with Bin Laden, Ayman Zawahiri and AQ, to provide the following support and acts in furtherance of the conspiracy and/or joint criminal enterprise in bombing the Nairobi and Dar es Salaam embassies:

- a. Safe harbor for training, planning and prevention of U.S. and international law enforcement from disrupting and interdiction of the attacks on the embassies;
- b. Weapons procurement;
- c. Safe and clandestine travel, within Afghanistan and from Afghanistan to Iran, Sudan and ultimately Kenya and Tanzania; and

d. Access to the international and U.S. monetary system, providing international monetary transfers in US dollar currency, for operations and perpetration of the attacks;

120. Each of the Defendants, intentionally participated in the joint criminal enterprise/conspiracy to wage violent jihad in Africa against the United States, its allies and Americans, including the attacks on the U.S. embassies in Kenya and Tanzania.

121. Each of the Defendants contributed to the acts of bombing the embassies, with the knowledge that AQ intended to attack Americans wherever located, without distinguishing between civilians, diplomats and military forces, in grave violation of international humanitarian and human rights laws.

122. Each of the Defendants was complicit in the bombing of the United States embassies.¹¹

123. As a direct and proximate consequence of the acts of each Defendant as set forth above and the injuries thereby inflicted, the above-named Plaintiffs have suffered the loss of immediate family members, physical, emotional and economic damages, and/or have been required to undergo extensive medical treatment, nursing care, and other treatment, for which they have been required to expend funds, have occasioned a loss of wages, and have endured great pain and suffering, humiliation, and embarrassment, and have thereby suffered damages as set forth below.

124. Each Defendant is liable for conspiring with AQ to perpetrate the bombings of the U.S. embassies as each Defendant (a) entered into express and/or implicit agreement(s) with

¹¹ Treaty of Rome, Article 25(3)(d) - "A person shall be criminally responsible and liable for the punishment of a crime within the jurisdiction of the Court if that person: ...

(d) In any other way contributes to the commission or attempted commission of such a crime by a group of persons acting with common purpose. Such contribution shall be intentional and shall either:

(i) Be made with the aim of furthering the criminal activity or criminal purpose of the group, where such activity or purpose involves the commission of a crime within the jurisdiction of the Court; or

(ii) Be made in the knowledge of the intention of the group to commit the crime."

AQ (b) to commit a tort or other wrongful act, (c) committing acts in furtherance of the agreement(s), (d) resulting in the harms to the Plaintiffs.

125. Each Defendant is liable for complicity with, and entering into a joint criminal enterprise (common plan) with AQ, as each Defendant entered into express and/or implicit agreements with AQ (a) to commit lethal and violent attacks against U.S. embassies, ambassadors, diplomats, civilians and employees of the U.S. government, (b) committing acts in furtherance of the agreements(s), (c) with the common plan and intention of waging a violent jihad against the United States, American citizens and employees of the U.S. government (and their families), (d) resulting in the harms to the Plaintiffs.¹²

126. WHEREFORE, the Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

COUNT III

(Aiding and Abetting Violation of the Laws of Nations)

127. The Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

128. The HQN provided funds, weapons, training, and safe harbor to AQ prior, during and subsequent to the attacks on the United States Embassies in Kenya and Tanzania. HQN and AQ jointly conducted terrorist attacks in Afghanistan, and India, maintaining joint command and control operations.

129. The HQN assisted AQ to relocate to Sudan in order to conduct violent jihad operations against the United States, its allies and American citizens in East Africa, including attacking the U.S. embassies in Kenya and Tanzania.

¹² “In the case of aiding and abetting, the requisite mental element is knowledge that the acts committed by the aider and abettor further the perpetration of a specific crime by the principal offender. In the case of co-perpetration, the intent to perpetrate the crime or to pursue the joint criminal purpose must be shown.” *Krnjelac Appeal*, Case No. IT-97-25-A, paragraph 51 (17 September 2003)

130. The Taliban/Islamic Emirate of Afghanistan continued to provide safe harbor and resources to AQ from 1996 to August 7, 1998, and subsequent thereto, continuing until today. Among other support, the Taliban provided Bin Laden and all senior AQ leaders facilities, and protection, safe harbor, transportation, and access to financial networks and conducted and conducts joint terrorist operations with AQ and Haqqani mujaheddin in Afghanistan from 1996 until today.

131. HQN provided safe harbor, land upon which to build training camps and command and control centers, training, weapons, recruits and financing to AQ, Bin Laden, Zawahiri, and all senior AQ leadership, from 1986 until August 7, 1998, and subsequent thereto continuing until today, directly and together with the Taliban and as leaders of the Islamic Emirate of Afghanistan.

132. Da Afghanistan Bank provided financial services and access to financial networks to AQ before, during and subsequent to the attacks on the United States embassies in Kenya and Tanzania.

133. Arnaout provided funding in U.S. dollars from Illinois to Afghanistan and Sudan, to fund and support AQ jihadi operations, including the attacks on the United States embassies in Kenya and Tanzania.

134. Criminal (and civil) liability for aiding and abetting violations of the laws of nations has long been recognized. For example, the Nuremberg Military Tribunal found guilty and sentenced to death Bruno Tesch, the owner of a company that supplied poison gas to Nazi concentration camps. The act (*actus reus*) of the defendants was supplying the poison gas. The mental state (*mens rea*) was the knowledge that the gas was being used to exterminate persons, which was sufficient for aiding and abetting liability, even though the accused did not share the intent or purpose of the Nazi government to commit mass murder and had denied

knowledge of the use to which the gas was to be put.¹³ Similarly, the in another case, the Military Tribunal held: “One who knowingly by his influence and money contributes to the support (of a violation of the law of nations) therefore must, under settled legal principles, be deemed to be, if not a principal, certainly an accessory to such crimes.”¹⁴

135. Articles 2-5 of the governing statute of the International Tribunal for the Former Yugoslavia authorized prosecution of grave breaches of the Geneva Conventions of 1949. Article 7 provides that:

“(1) A person who planned, instigated, ordered, committed or otherwise aided and abetted in the planning, preparation, or execution of a crime referred to in Articles 2-5 ... shall be individually responsible for the crime...”

136. Similar to U.S. common law, the aiding and abetting must be substantial. “[T]he trial chamber holds that the *actus reus* (act) of aiding and abetting in international criminal law requires practical assistance, encouragement or moral support which has a substantial effect on the perpetration of the crime.” *Prosecutor v. Furundžija*, Case No. IT-95-17/1-T, paragraph 199 (10 December 1998).¹⁵

137. The *mens rea* requirement for aiding and abetting is “knowledge that these acts assist the commission of the offense...The trial chamber agreed with the statement in the Furundžija trial judgment that ‘it is not necessary that the aider and abettor...know the precise crime that was intended and which in the event was committed. If he is aware that one of a number of crimes will probably be committed and one of those crimes is in fact committed, he has

¹³ *In re Tesch (The Zyklon B Case)*, 13 International Report 250 (1947) (British Military Court, March 1-8, 1946)

¹⁴ *United States v. Flick*, 6 Trials of War Criminals Before the Nuremberg Tribunals 1187, 1217 (1947).

¹⁵ See also *Prosecutor v. Blaskic*, Case No. IT-95-14-A, Appellate Chamber (29 July 2004), “One of the requirements of the *actus reus* (act) of aiding and abetting is that the support of the aider and abettor has a substantial effect upon the perpetration of the crime. In this regard, (the appellate chamber) agrees with the trial chamber that proof of a cause-effect relationship between the conduct of the aider and abettor and the commission of the crime, or proof that such conduct served as a condition precedent to the commission of the crime, is not required.”

intended to facilitate the commission of that crime and is guilty as an aider and abettor.’ The Appeals Chamber concurs with this conclusion.”¹⁶

138. Under customary international law, and under the jurisprudence of all of the ad hoc international tribunals since 1945, the mens rea required in aiding and abetting is knowledge but does not require the aider or abettor share the purpose of the primary perpetrator. *Prosecutor v. Kunarac*, Appeals Chamber, Case No. IT-96-23 and IT-96-23/1-A (12 June 2002).

139. The Tribunals have distinguished between “aiding and abetting liability, where the aider or abettor knows, or should have known, that it was foreseeable that the primary perpetrator would commit the criminal acts and the aider or abettor was aware of the essential elements of the crime which was ultimately committed, and “co-perpetration” where the aider or abettor either intended to perpetrate the crime or pursue a joint criminal purpose.¹⁷

140. The Treaty of Rome (statute of the International Criminal Court) provides for “aiding and abetting liability” under Article 25 (3)(c) but adds the element of “purpose” to the mens rea to the mens rea requirement. “a person shall be responsible and criminally liable for punishment for a crime within the jurisdiction of the Court if that person:...(c) For the purpose of facilitating the commission of a crime, aids, abets or otherwise assists in its commission or attempted commission, including providing the means for its commission.”

141. As of the date of the attacks on the United States embassies, no nation had yet ratified the Treaty of Rome. Afghanistan ratified the treaty on February 10, 2003, and Sudan signed the treaty on September 8m 2000 but never ratified it. Likewise, the treaty has not been ratified by a majority of states, including the United States, the Russian Federation, China and India.

¹⁶ Id, paragraphs 46 and 50.

¹⁷ *Krnjelac Appeal*, Case No. IT-97-25-A, paragraph 51 (17 September 2003)

142. Each of the Defendants knowingly and intentionally provided substantial aid and assistance to AQ prior to and subsequent to the bombing of the U.S. embassies and each Defendant proximately caused the bombings which resulted in the deaths and injuries to the Plaintiffs.

143. Bin Laden and AQ publicly announced their intentions to kill Americans and eject the United States from Africa and the Middle East, prior to the bombings of the U.S. embassies. Each Defendant knew AQ's intentions, knew or must have known that AQ would target U.S. embassies, including the embassies in Kenya and Tanzania, and each purposefully assisted AQ in its global jihad against the United States and its allies.

144. Each of the Defendants aided and abetted in the bombings of the United States embassies and the deaths and injuries to the Plaintiffs.

145. As a direct and proximate consequence of the acts of each Defendant as set forth above and the injuries thereby inflicted, the above-named Plaintiffs have suffered the loss of immediate family members, suffered physical, emotional and economic damages and/or have been required to undergo extensive medical treatment, nursing care, and other treatment, for which they have been required to expend funds, have occasioned a loss of wages, and have endured great pain and suffering, humiliation, and embarrassment, and have thereby suffered damages as set forth below.

146. WHEREFORE, the Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

COUNT IV
Violation of the Anti-Terrorism Act, 18 U.S.C. §2333

147. American Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

148. The Anti-Terrorism Act ("ATA") provides that "[a]ny national of the United States injured in his or her person, property, or business by reason of an act of international terrorism,

or his or her estate, survivors, or heirs may sue thereof in any appropriate district court of the United States and shall recover threefold the damages he or she sustains and the cost of the suit, including attorney's fees." 18 U.S.C. § 2333(a). Liability under the ATA exists when three elements are satisfied—first, an American national must have suffered an injury; second, there must have been an unlawful act of international terrorism; and third, the injury must have been caused by that act. See *Owens v. BNP Paribas, S.A.*, 897 F.3d 266, 270 (D.C. Cir. 2018); *Waldman v. Palestine Liberation Org.*, 835 F.3d 317, 335–36 (2d Cir. 2016).

149. The Defendants are jointly and severally liable under the ATA for the harm that the American Plaintiffs suffered from the embassy bombings. By harboring and providing financial and other material support to Bin Laden and AQ and their plot to murder American nationals abroad, each Defendant independently engaged in an act(s) of international terrorism that caused the embassy bombings and the damages to each of the American Plaintiffs.

INJURY

150. As alleged herein, American Plaintiffs were killed or injured by the embassy bombings, or they suffered injury as family members of victims of the bombings.

INTERNATIONAL TERRORISM

151. Conduct qualifies as "international terrorism" when three components are met. First, the conduct must violate the criminal laws of the United States and pose a danger to human life. 18 U.S.C. § 2331(1)(A). Second, the conduct must be carried out with a terroristic intent. *Id.* § 2331(1)(B). And finally, the conduct must "occur primarily outside the territorial jurisdiction of the United States." *Id.* § 2331(1)(C).

152. AQ committed acts of international terrorism by planning, funding, commanding and executing the suicide bombing attacks on the United States embassies in Nairobi and Dar es Salaam, which constituted acts in violation of the criminal laws of the United States and obviously posed a danger to human life, and as intended, killed 224 persons and injured

approximately 5,000 others, with the goal of intimidating and coercing the United States to withdraw from the Middle East and cease supporting the governments of Muslim state allies.

153. Each other Defendant committed acts of international terrorism by providing substantial material support to Bin Laden and AQ, which violated criminal laws of the United States and posed known and foreseeable dangers to human life, with the goal of intimidating and coercing the United States to withdraw from the Middle East and cease supporting the governments of Muslim state allies.

- a. The Taliban and the Islamic Emirate of Afghanistan provided safe harbor, access to international financial networks, protection of AQ command and control facilities and training bases;
- b. HQN provided land under its control and protection to construct command and control centers and training bases, direction and guidance to turn Bin Laden and AQ from conducting local and regional jihad (in Afghanistan) to a global jihad directed primarily against the United States, its citizens, employees, diplomats, and allies, religious edicts (fatwa) giving religious justification for AQ and HQN's ideology obligating all Muslims to conduct jihad against the United States and Americans wherever located, training, joint command and joint operations, and recruitment of mujahidin;
- c. Enaout, from his base in Illinois, establish offices in Afghanistan, Sudan to facilitate the transfer of funds to Bin Laden, AQ, HQN, the Taliban and the Islamic Emirate of Afghanistan, for the known and intended purposes of conducting violent, lethal regional and global jihad, against the United States, its citizens, employees and allies.
- d. DAB provided the financial services and access to the U.S. and international financial systems, providing the necessary funding for the operations of AQ, HQN, the Taliban and the Islamic Emirate of Afghanistan, knowing and intending that such operations

included the violent and lethal jihad being conducted by the Defendants against the United States, its citizens, employees and allies.

First Component—Dangerous Criminal Acts

154. Conduct qualifies as “international terrorism” if it involves “violent acts or acts dangerous to human life that are a violation of the criminal laws of the United States or of any State, or that would be a criminal violation if committed within the jurisdiction of the United States or of any State.” 18 U.S.C. § 2331(1)(A).

155. The Conduct of AQ, HQN, the Taliban, the Islamic Emirate of Afghanistan, Earnout and DAB before and after the embassy bombings undoubtedly put human lives in danger and violated multiple federal criminal statutes, including 18 U.S.C. § 2339, 18 U.S.C. §2339A, and 18 U.S.C. § 2332. Each predicate offense provides an independent basis for concluding that this element of the definition of “international terrorism” is satisfied.

156. The first predicate criminal offense that the Taliban committed was harboring or concealing terrorists under 18 U.S.C. § 2339.

- a. Section 2339 of Title 18 criminalizes harboring or concealing persons when an individual “knows” or “has reasonable grounds to believe” that person is about to commit certain violent crimes, including arson or bombing of government property that causes injury or death, use of weapons of mass destruction, or acts of terrorism transcending national boundaries.
- b. The Taliban deliberately harbored and concealed Bin Laden and AQ operatives despite knowing that Bin Laden and AQ were preparing for imminent terrorist attacks on United States targets overseas. See, e.g., *Sokolow v. Palestine Liberation Org.*, 60 F. Supp. 3d 509, 521 (S.D.N.Y. 2014) (finding a triable fact question about whether the defendant committed an ATA predicate offense under § 2339 by “providing material support” to Hamas “in the form of money, a phone, weapons, bomb-making

supplies, and a safehouse” to a “ Hamas operative and known terrorist”).

(i) *Actus Reus*. Bin Laden and AQ sought refuge and set up their headquarters in Afghanistan shortly after the Taliban seized control of the majority of the territory of Afghanistan. The Taliban maintained a close relationship with Bin Laden and AQ before and after the embassy bombings. The Taliban provided AQ the safe haven and resources—including weapons and training facilities—that it needed to plan and execute the embassy bombings. The Taliban allowed AQ operatives to roam freely throughout the country without visas or immigration documentation. And, with the Taliban’s blessing, AQ used Afghanistan’s national aircraft to transport members, recruits and supplies from overseas for the purpose of engaging in acts of terrorism.

(ii) *Mens Rea*. The Taliban knew of Bin Laden’s plan to commit acts of international terrorism against the United States generally and had ample reason to know of the plot to bomb the embassies specifically. The Taliban also knew of had reasonable grounds to know that Bin Laden and AQ were committing acts of terrorism before and after the 1998 embassy bombings during the time when the Taliban provided them with safe haven. The Taliban chose to provide Bin Laden and AQ with safe haven, training camps, and weapons, notwithstanding Bin Laden’s public fatwas calling for war against the United States and denied the United States’ request to turn over Bin Laden before the embassy bombings.

157. The second predicate criminal offense that the Taliban committed was providing material support to terrorists under 18 U.S.C. § 2339A.

a. *Actus Reus*. The Taliban provided multiple forms of “material support” to Bin Laden and AQ. It provided a “safehouse” under § 2339A(b)(1) by allowing Bin Laden and AQ to operate from its territory in Afghanistan. Owens, 826 F. Supp. 2d

at 150–51. It provided “training, expert advice or assistance” under § 2339A(b) through training camps. *Id.* It also provided transportation, weapons, and other resources that qualify as material support under § 2339A.

- b. Mens Rea. Section 2339A requires only “knowledge or intent that the resources given to terrorists are to be used in the commission of terrorist acts”; it does not require “the specific intent to aid or encourage the particular attacks that injured plaintiffs.” *Linde v. Arab Bank, PLC*, 384 F. Supp. 2d 571, 586 n.9 (E.D.N.Y. 2005); see also *Schansman v. Sberbank of Russia PJSC*, 2021 WL 4482172, (S.D.N.Y. Sept. 30, 2021) (same). The Taliban knew or had reason to know that the training camps and other resources it provided were being used to commit acts of terror. The Taliban nevertheless continued to provide material support to Bin Laden and AQ. See, e.g., *Schansman*, 2021 WL 4482172, (finding the mens rea requirement under § 2339A satisfied when the defendants provided material support for terrorist activities despite being on notice of those activities).

158. The third predicate criminal offense that the Taliban committed was conspiring to kill United States nationals under 18 U.S.C. § 2332(b).

- a. Section 2332(b) of Title 18 criminalizes conspiring to murder or cause serious bodily injury to United States nationals abroad. “Proof of a conspiracy under § 2232(b) requires a plaintiff to establish that the defendant ‘(1) knew about the aims and objectives of the [alleged] criminal conspirac[y], (2) agreed to the essence of these objectives, and (3) performed acts . . . intended to further these objectives.’” *Gill v. Arab Bank, PLC*, 893 F. Supp. 2d 542, 554 (E.D.N.Y. 2012).
- b. The Taliban conspired with Bin Laden and AQ to plan and execute the embassy bombings. The Taliban knew about Bin Laden and AQ’s intent to kill United States nationals and agreed to participate in their plots as evidenced by their provision of

the resources and refuge that Bin Laden and AQ needed to carry out the objective of killing Americans abroad.

159. The Taliban’s conduct likewise posed a danger to human life. The Taliban provided one of the most notorious terrorist organizations with weapons, training facilities, transportation, and a base of operations from which to mastermind deadly terrorist attacks. That support helped AQ and Bin Laden accomplish the goal that they publicly announced mere months before the embassy bombings—the mass murder of Americans and their allies. Cf. *Lelchook v. Islamic Republic of Iran*, 393 F. Supp. 3d 261, 266 (E.D.N.Y. 2019) (finding that providing financial support to known terrorist groups constituted acts “dangerous to human life”).

Second Component—Terroristic Intent

160. Conduct does not qualify as “international terrorism” unless it appears intended “to intimidate or coerce a civilian population,” “to influence the policy of a government by intimidation or coercion,” or “to affect the conduct of a government by mass destruction, assassination, or kidnapping.” 18 U.S.C. § 2331(1)(B).

161. The Taliban acted with terroristic intent by providing resources and refuge to Bin Laden and AQ knowing they would use that support to commit acts of terror. Bin Laden issued fatwas specifically calling for acts of violence against the United States in an effort to intimidate the United States and affect U.S. foreign policy. The Taliban’s decision to provide refuge and resources to Bin Laden and AQ, even after those fatwas were issued, made the Taliban a part of their conspiracy, which necessarily means that the Taliban’s actions were intended to “intimidate or coerce a civilian population,” to “influence the policy of a government by intimidation or coercion,” or to “affect the conduct of a government” by various means. See *Boim v. Holy Land Found. for Relief & Dev.*, 549 F.3d 685, 693–94, 708 (7th Cir. 2008) (quotation marks omitted); see also *Abecassis v. Wyatt*, 7 F. Supp. 3d 668, 676

(S.D. Tex. 2014) (“Donations appear to be intended to intimidate or coerce a civilian population, influence the policy of a government by intimidation or coercion, or affect the conduct of a government by mass destruction, assassination or kidnapping when a donor knows the terroristic aims and activities of its recipient and when it is foreseeable that the donations will advance such terroristic aims.”). The Taliban’s conduct after the attacks—including its continued provision of support to AQ and its refusal to surrender Bin Laden and AQ operatives despite being presented with evidence of their role in international terrorism—further confirms that it acted with terroristic intent.

162. The final component of international terrorism requires the relevant conduct to occur outside the territorial jurisdiction of the United States. 18 U.S.C. § 2331(1)(C). All the relevant conduct took place outside the United States—the Taliban provided refuge and resources to Bin Laden and AQ in Afghanistan where the attacks were planned, and the bombings themselves occurred in Kenya and Tanzania.

163. ATA liability exists when injuries are caused “by reason of” international terrorism. That causation requirement is met when injuries are proximately caused by the defendant’s conduct. See *Rothstein v. UBS AG*, 708 F.3d 82, 95 (2d Cir. 2013). “[P]roximate cause requires a showing that Defendant’s actions were ‘a substantial factor in the sequence of responsible causation,’ and that the injury was ‘reasonably foreseeable or anticipated as a natural consequence.’” *Strauss v. Credit Lyonnais, S.A.*, 925 F. Supp. 2d 414, 432 (E.D.N.Y. 2013) (quoting *Lerner v. Fleet Bank, N.A.*, 318 F.3d 113, 123 (2d Cir. 2003)).

164. The D.C. Circuit held in *Owens v. Republic of Sudan* that Sudan’s conduct proximately caused the 1998 embassy bombings. 864 F.3d 751, 797 (D.C. Cir. 2017), vacated and remanded sub nom. on other grounds, *Opati v. Republic of Sudan*, 140 S. Ct. 1601 (2020). Sudan’s conduct was a substantial factor in bringing about the attacks because Sudan fostered al-Qaeda’s economic growth, sheltered the terrorist group from local police, and provided it

with critical financial support. *Id.* at 794. The injuries from the bombing were reasonably foreseeable because it was obvious that AQ “would attack American interests wherever it could find them.” *Id.* at 798. Notably, the court found that Sudan caused the embassy bombings despite the fact that Sudan cut ties with Bin Laden in 1996 by expelling him from the country. *Id.* at 796.

165. Like Sudan’s conduct in Owens, the Defendants’ actions were a substantial factor in causing the embassy bombings. The Taliban, the Islamic Emirate of Afghanistan and HQN gave Bin Laden and AQ the safe haven they needed to establish a base of operations from which to plan and prepare for their acts of terror—including the embassy bombings and other material support needed to conduct the bombings—including the camp where one of the bombers extensively trained, weapons and resources needed to develop and sustain the terrorist organization, the ability to freely travel in and out of the country in planning for the embassy attacks, and cover from foreign intelligence services that could have prevented the attacks from happening. Furthermore, the Taliban’s refusal to hand Bin Laden over to the United States months before the embassy bombings occurred had a direct and substantial effect on the embassy bombings. Earnout and DAB provided funding and access to the international financial markets which were necessary and critical for perpetrating the attacks on the embassies and maintaining AQ, procuring weapons, costs of training and providing financial support for the families of AQ terrorists. If anything, the Defendants are more culpable than Sudan because, unlike Sudan, the Defendants provided a wide range of support and substantial assistance stretching over decades, including during the immediately preceding days, months, and years before the attacks.

166. The death and severe physical, mental, and emotional injuries that the American Plaintiffs suffered were the reasonably foreseeable and natural result of the embassy bombings. The Taliban anticipated and intended that AQ’s terrorist acts would cause serious

injuries and death.

167. WHEREFORE, the previously named American Plaintiffs demand judgment against the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

COUNT V

Aiding and Abetting Violations of the Anti-Terrorism Act, 18 U.S.C. §2333

168. Congress enacted JASTA, amending Section 2333 of the ATA “to provide civil litigants with the broadest possible basis to seek relief against those who have provided material support, directly or indirectly, to foreign organizations or persons that engage in terrorist activities against the United States.” *Siegel v. HSBC N. Holdings, Inc.*, 933 F.3d 217, 233 (2d Cir. 2019) (quoting 18 U.S.C. §2333 Statutory Notes).

169. Secondary liability is imposed in an action “for an injury arising from an act of international terrorism committed, planned or authorized by a Foreign Terrorist Organization under section 219 of the Immigration and Nationality Act (U.S.C. §1189).”¹⁸

170. AQ continues to be and was at the time of the terrorist attacks on the U.S. embassies in Nairobi and Dar es Salaam, a designated Foreign Terrorist Organization.

171. Each of the defendants knowingly and intentionally provided substantial assistance to AQ, specifically intended to assist in attacking the United States and American citizens.

172. Each Defendant knew AQ established a base in Sudan and that each had a general awareness that AQ would be attacking the United States and American citizens located in Africa.

173. It was foreseeable that two of the targets of AQ attacks would be the U.S. embassies in Nairobi Dar es Salaam.

¹⁸ 18 U.S.C. §1333(d)(2)

174. In enacting JASTA, Congress stated that *Halberstam v. Welch*, 705 F.2d 472 (D.C. Cir. 1983), provides “the proper legal framework” for “[f]ederal civil aiding and abetting and conspiracy liability.” JASTA, § 2(a)(5).

175. In *Halberstam*, the Court set forth the three elements of civil aiding and abetting claim: (1) “the party whom the defendant aids must perform a wrongful act that causes an injury; (2) the defendant must be generally aware of his role as part of an overall illegal or tortious activity at the time that he provides the assistance; [and] (3) the defendant must knowingly and substantially assist the principal violation.” 705 F.2d at 477.

176. The actus rea and mens rea of each defendant satisfy the three elements set forth above.

177. WHEREFORE, the previously named American Plaintiffs demand judgment against the Taliban and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

COUNT VI

Conspiracy in Violation of the Anti-Terrorism Act, 18 U.S.C. §2333

178. Plaintiffs repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.

179. In knowingly agreeing to provide material support or resources to perpetrate the bombings of the United embassies in Nairobi and Dar es Salaam in violation of 18 U.S.C. § 2339A, and knowing, or generally aware of the fact that the object of the Conspiracy was to provide material support for terrorism and to commit acts of terrorism, and having committed and completed overt acts in furtherance of the Conspiracy, each Defendant is civilly liable for damages to each Plaintiff for their injuries pursuant to 18 U.S.C. § 2333(d).

The Conspiracy

180. The Defendants individually or jointly, entered into agreements to provide the following support and acts in furtherance of the conspiracy in bombing the Nairobi and Dar es Salaam embassies:

- a. Safe harbor for training, planning and prevention of U.S. and international law enforcement the disruption and interdiction of the attacks on the embassies;
- b. Weapons procurement;
- c. Safe and clandestine travel, within Afghanistan and from Afghanistan to Iran, Sudan and ultimately Kenya and Tanzania; and
- d. Funding and providing access to the international and U.S. monetary system, providing international transfers for operations and perpetration of the attacks;

181. Each of the Defendants, intentionally participated in the conspiracy to wage violent jihad in Africa against the United States, its allies and Americans, including the attacks on the U.S. embassies in Kenya and Tanzania.

182. As a direct and proximate consequence of the acts of each Defendant as set forth above and the injuries thereby inflicted, the above-named Plaintiffs have been required to undergo extensive medical treatment, nursing care, and other treatment, for which they have been required to expend funds, have occasioned a loss of wages, and have endured great pain and suffering, humiliation, and embarrassment, and have thereby suffered damages as set forth below.

Elements of Conspiracy

183. The elements of the conspiracy are:

- a. An agreement to join a conspiracy, which can be inferred from a tacit understanding;
- b. The performance of unlawful acts as a part of the conspiracy;
- c. Injury caused by one or more of the parties; and

- d. That the overt acts were pursuant to the common scheme and objective of the conspiracy.

184. Each Defendant is liable for conspiring with AQ to perpetrate the bombings of the U.S. embassies as each Defendant (a) entered into express and/or implicit agreement(s) with AQ (b) to commit unlawful, lethal and violent attacks against U.S. embassies, ambassadors, diplomats, civilians and employees of the U.S. government, (c) resulting in injury and death to the Plaintiffs, (d) with the common plan and intention of waging a violent jihad against the United States, American citizens, ambassadors, and employees of the U.S. government (and their families).

Foreseeable Risk

185. Violence against American citizens, ambassadors, and employees of the U.S. government (and their families) is a “foreseeable risk” and not outside the scope of a conspiracy to perpetrate the bombings of the U.S. embassies.

186. Each Plaintiff’s injuries and/or deaths constitute harm falling within the risk contemplated by each Defendant’s violations of U.S. law and sanctions. Further, each Defendant had knowledge of, or general awareness of the fact that a specific, foreseeable aim and purpose of the conspiracy was to commit acts of terrorism. Injuries and deaths resulting from the bombing of the U.S. Embassies are precisely the risks of terrorist attacks.

Acts of International Terrorism

187. The Defendants’ acts either occurred primarily outside the territorial jurisdiction of the United States or transcended national boundaries in terms of the means by which they were accomplished.

188. Each Defendant’s agreement to enter into the conspiracy to perpetrate the bombings of the U.S. embassies were themselves acts of international terrorism because they either were, or objectively appear to have been intended to: (a) intimidate or coerce the civilian population

of the United States and other nations, (b) influence the policy of the governments of the United States and other nations by intimidation or coercion (in part to cause them to withdraw Coalition Forces from Iraq), and/or (c) affect the conduct of the governments of the United States and other nations by facilitating the killing and injuring hundreds of U.S. embassy employees, civilians and ambassadors.

189. WHEREFORE, the Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

COUNT VII

Assault and Battery

190. The Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

191. As a result of the bombings of the United States embassies in Nairobi and Dar es Salam on August 7, 1998, Plaintiffs suffered severe and permanent injuries, including but not limited to brain injuries, concussions, internal bleeding, lung injuries, spinal injuries, shoulder injuries, destruction of joints, blast burns, severe lacerations that have resulted in permanent scarring, permanent blindness, detached retinas, partial loss of vision, permanent total or partial loss of hearing, punctured eardrums, loss of teeth, broken teeth, tissue damage, nerve damage, shrapnel and glass wounds, fractures, multiple cuts, abrasions, and bruises, swelling of feet, headaches, loss of balance, erectile dysfunction, loss of memory and mental ability, and severe post-traumatic stress disorder.

192. Each of the Defendants shared the goal, purpose and intent of AQ in co-participation in the attacks, to inflict maximum physical and/or emotional/psychological harm to each of the Plaintiffs.

193. As a direct and proximate consequence of the acts of Defendant as set forth above and the injuries thereby inflicted, the above-named Plaintiffs have been required to undergo

extensive medical treatment, nursing care, and other treatment, for which they have been required to expend funds, have occasioned a loss of wages, and have endured great pain and suffering, humiliation, and embarrassment, and have thereby suffered damages as set forth below.

194. WHEREFORE, the previously named Foreign Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

COUNT VIII **(Aiding and Abetting Assault and Battery)**

195. The Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

196. As a result of the bombings of the United States embassies in Nairobi and Dar es Salam on August 7, 1998, Plaintiffs suffered severe and permanent injuries, including but not limited to brain injuries, concussions, internal bleeding, lung injuries, spinal injuries, shoulder injuries, destruction of joints, blast burns, severe lacerations that have resulted in permanent scarring, permanent blindness, detached retinas, partial loss of vision, permanent total or partial loss of hearing, punctured eardrums, loss of teeth, broken teeth, tissue damage, nerve damage, shrapnel and glass wounds, fractures, multiple cuts, abrasions, and bruises, swelling of feet, headaches, loss of balance, erectile dysfunction, loss of memory and mental ability, and severe post-traumatic stress disorder.

197. WHEREFORE, the Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

COUNT IX **(Intentional Infliction of Emotional Distress)**

198. The Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

199. The bombings of the U.S. embassies were done with the intent to cause, and did in fact cause, severe emotional distress to the Plaintiffs. The explosions and resulting severe emotional distress were caused by the willful and deliberate acts of each Defendant, acting jointly and/or in concert with AQ, and providing it with material and financial support, weapons, training, safe harbor and protection. Each Defendant did so with intent to cause severe emotional distress to the Plaintiffs and others or believed that such infliction of severe emotional distress was substantially certain to result from its acts, or with disregard of a substantial probability of causing severe emotional distress to the Plaintiffs. The bombings and Defendant's co-participation and/or significant, material support, constitute conduct outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency and humanity, utterly intolerable in a civilized community.

200. WHEREFORE, the Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

COUNT X

(Aiding and Abetting Intentional Infliction of Emotional Distress)

201. The Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

202. The bombings of the U.S. embassies were done with intent to cause, and did in fact cause, severe emotional distress to the Plaintiffs. The explosions and resulting severe emotional distress were caused by the willful and deliberate acts of each Defendant, acting jointly and/or in concert with AQ, and providing it with material and financial support, weapons, training, safe harbor and protection. At all relevant times prior to and at the time of the bombings, each Defendant was aware of its role in illegal and/or tortuous activity, and it was known to each Defendant that the probable and foreseeable consequence of its actions would be the severe emotional distress deliberately caused to the Plaintiffs. The bombings and Defendant's co-participation and/or significant, material support, constitute conduct outrageous in character,

and so extreme in degree, as to go beyond all possible bounds of decency and humanity, utterly intolerable in a civilized community.

203. WHEREFORE, the Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

COUNT XI
(Wrongful Death)

204. The Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

205. The bombings of the U.S. embassies were done with the intent to cause, and did in fact cause, the death of some of the Plaintiffs. The explosions and resulting extrajudicial killings were caused by the willful and deliberate acts of each Defendant, acting jointly and/or in concert with AQ, and providing it with material and financial support, weapons, training, safe harbor and protection. Each Defendant did so with the intent to cause the extrajudicial killing of some of the Plaintiffs. The bombings and Defendant's co-participation and/or significant, material support, constitute conduct outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency and humanity, utterly intolerable in a civilized community.

206. WHEREFORE, the Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

COUNT XII
(Aiding and Abetting Wrongful Death)

207. The Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

208. The bombings of the U.S. embassies were done with intent to cause, and did in fact cause, the death of some of the Plaintiffs. The explosions and resulting extrajudicial killings were caused by the willful and deliberate acts of each Defendant, acting jointly and/or in

concert with AQ, and providing it with material and financial support, weapons, training, safe harbor and protection. At all relevant times prior to and at the time of the bombings, each Defendant was aware of its role in illegal and/or tortuous activity, and it was known to each Defendant that the probable and foreseeable consequence of its actions would be the extrajudicial killings of some of the Plaintiffs. The bombings and Defendant's co-participation and/or significant, material support, constitute conduct outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency and humanity, utterly intolerable in a civilized community.

209. WHEREFORE, the Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

COUNT XIII (Survival)

210. The Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

211. The bombings of the U.S. embassies were done with intent to cause, and did in fact cause, the life-threatening and lethal harm to some of the Plaintiffs. The explosions and resulting extreme bodily and mental pain and suffering caused by the willful and deliberate acts of each Defendant, acting jointly and/or in concert with AQ, and providing it with material and financial support, weapons, training, safe harbor and protection. The bombings and Defendant's co-participation and/or significant, material support, constitute conduct outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency and humanity, utterly intolerable in a civilized community.

212. WHEREFORE, the Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

COUNT XIV

(Aiding and Abetting Survival Claims)

213. The Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

214. The bombings of the U.S. embassies were done with intent to cause, and did in fact cause, the life-threatening and lethal harm to some of the Plaintiffs. The explosions and resulting extreme bodily and mental pain and suffering caused by the willful and deliberate acts of each Defendant, acting jointly and/or in concert with AQ, and providing it with material and financial support, weapons, training, safe harbor and protection. At all relevant times prior to and at the time of the bombings, each Defendant was aware of its role in illegal and/or tortuous activity, and it was known to each Defendant that the probable and foreseeable consequence of its actions would be the extrajudicial killings of some of the Plaintiffs. The bombings and Defendant's co-participation and/or significant, material support, constitute conduct outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency and humanity, utterly intolerable in a civilized community.

215. WHEREFORE, the Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

**COUNT XV
(Loss of Consortium)**

216. The Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

217. The bombings of the U.S. embassies were done with intent to cause, and did in fact cause, severe and permanent injuries, including but not limited to brain injuries, concussions, internal bleeding, lung injuries, spinal injuries, shoulder injuries, destruction of joints, blast burns, severe lacerations that have resulted in permanent scarring, permanent blindness, detached retinas, partial loss of vision, permanent total or partial loss of hearing, punctured eardrums, loss of teeth, broken teeth, tissue damage, nerve damage, shrapnel and glass wounds, fractures, multiple cuts, abrasions, and bruises, swelling of feet, headaches, loss of balance,

erectile dysfunction, loss of memory and mental ability, and severe post-traumatic stress disorder.

218. The explosions and resulting extreme bodily and mental pain and suffering caused by the willful and deliberate acts of each Defendant, acting jointly and/or in concert with AQ, and providing it with material and financial support, weapons, training, safe harbor and protection were intended cause, and did in fact cause, a loss of support and services, love, companionship, affection, society, sexual relations, and solace, and a loss of consortium detrimental to the marital and family relationships of Plaintiffs, who have thereby suffered damages as set forth below. The bombings and Defendant's co-participation and/or significant, material support, constitute conduct outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency and humanity, utterly intolerable in a civilized community.

219. WHEREFORE, the Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

COUNT XVI **(Aiding and Abetting Loss of Consortium)**

220. The Plaintiffs incorporate the preceding paragraphs as if fully set forth herein.

221. The bombings of the U.S. embassies were done with intent to cause, and did in fact cause, severe and permanent injuries, including but not limited to brain injuries, concussions, internal bleeding, lung injuries, spinal injuries, shoulder injuries, destruction of joints, blast burns, severe lacerations that have resulted in permanent scarring, permanent blindness, detached retinas, partial loss of vision, permanent total or partial loss of hearing, punctured eardrums, loss of teeth, broken teeth, tissue damage, nerve damage, shrapnel and glass wounds, fractures, multiple cuts, abrasions, and bruises, swelling of feet, headaches, loss of balance, erectile dysfunction, loss of memory and mental ability, and severe post-traumatic stress disorder.

222. The explosions and resulting extreme bodily and mental pain and suffering caused by the willful and deliberate acts of each Defendant, acting jointly and/or in concert with AQ, and providing it with material and financial support, weapons, training, safe harbor and protection were intended cause, and did in fact cause, a loss of support and services, love, companionship, affection, society, sexual relations, and solace, and a loss of consortium detrimental to the marital and family relationships of Plaintiffs, who have thereby suffered damages as set forth below. At all relevant times prior to and at the time of the bombings, each Defendant was aware of its role in illegal and/or tortuous activity, and it was known to each Defendant that the probable and foreseeable consequence of its actions would cause loss of consortium to the Plaintiffs. The bombings and Defendant's co-participation and/or significant, material support, constitute conduct outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency and humanity, utterly intolerable in a civilized community.

223. WHEREFORE, the Plaintiffs demand judgment against each of the Defendants, jointly and severally, and compensatory and punitive damages, plus interest, and costs, and any other monetary or equitable relief the Court may deem proper.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray that this Court grant:

224. Grant judgment to Plaintiffs in favor of and against each Defendant, jointly, severally, and *in solido*.

225. Order compensatory damages, punitive damages, prejudgment interest and other appropriate interest, costs and expenses, attorneys' fees, and such other and further relief as this Honorable Court may determine to be just and appropriate under the circumstances.

Respectfully submitted this 19th day of October 2022

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